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**Proposed PACE 2020 Audit Protocol (CMS-10630; OBM control number: 0938-1327)**

Document Name	Section, Page #	Description of Issue or Question	Suggested Revision/Comment/Question
Supporting Statement	pg. 3 and 13	<p>The Supporting Statement indicates that CMS uses a risk assessment to determine how often the PACE organization will be selected for an audit. However, the "<b>Audit Process and Data Request</b>" document is silent on this component.</p> <p>Pg. 3 <b>CMS determines by risk</b> how often organizations are subject to audits following the trial period.</p> <p>Pg. 13 Additionally, since publishing this package for the 60-day comment period, a new regulation has gone into effect which allows <b>CMS to conduct ongoing audits using a risk assessment</b>. This new regulation allows CMS to reduce the number of audits conducted annually from approximately 70 audits a year to approximately 35 audits a year.</p>	<p>The "<b>Audit Process and Data Request</b>" document should be modified to include a section that further describes the CMS risk-based approach (criteria? range of score that would qualify for an audit?) to provide clarification on the frequency that a PACE organization could expect an audit after the trial period. At a minimum, it would be helpful for CMS to include the regulatory citation of the new regulation that has gone into effect which allows this risk-based approach, so that PACE organizations can cross-reference where this citation is stemming from. It seems it would fit well under the "<b>Audit Purpose and General Guidelines</b>" section.</p>
PACE Audit Process and Data Request: Section II.1. (Select Sample Cases: Participant Observations)	pg. 12	Please clarify whether participant observations will also occur at ACS sites, if applicable. Currently the description only indicates "skilled care provided in participants' homes" and "skilled care provided at the center".	<p>If participant observations will occur at ACS sites, suggest updating language to explicitly indicate as such:</p> <ul style="list-style-type: none"> <li>• Skilled care provided in participants' homes, including wound care and medication administration;</li> <li>• Skilled care provided at the PACE center, including wound care and medication administration; and</li> <li>• Skilled care provided at the Alternative Care Setting (ACS), including wound care and medication administration (if applicable); and</li> </ul>
PACE Audit Process and Data Request: Appendix A. (PACE Record Layouts) Tables 1-6	pg. 18-35	Record Layouts do not include Field Lengths for each Column ID. Does this mean field lengths will not apply and that there is not maximum characters per record row?	Update the record layouts for Tables 1-6 to include field lengths and maximum character counts per record row(if applicable).