**Attachment A:**

**Comments to CMS’ Proposed Enhancements to the 2015 Star Ratings and Beyond**

**Instructions:**

1. We prefer comments are sent in this format. For each proposed change, you may submit comments and recommendations separately. Please note the maximum character limit per field. You may leave a section blank if you have no comments to a proposed change.
2. Please use the following naming convention when saving this file with your comments: R4C \_[Organization name]\_[date]

Example: R4C \_ABC organization\_120113

1. Please email your comment file to [PartCRatings@cms.hhs.gov](mailto:PartCRatings@cms.hhs.gov) **by 5 pm ET on Thursday, 12/19/2013**.

The subject of your email should include “Request for Comments”.

1. **Commenter Information**

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| --- | --- | --- |
| **Individual Name** |  | |
| **Organization Name** |  | |
| **Contract Name** (leave blank if n/a) |  | |
| **Contract ID (**leave blank if n/a; if multiple IDs are entered use “;” as the delimiter) |  | |
| **Type of Commenter** (check one) | Part C/D Plan Sponsor | |
|  | Research Organization | |
|  | Trade/Professional Organization | |
|  | Consultant  Pharmacy Benefit Manager (PBM)  Advocacy Group  Pharmaceutical Manufacturer | |
|  | Other (please specify): |  |

1. **Comments ON CMS Proposed Changes to the 2015 Star Ratings**

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| **Comment Topic:** A. New 2015 Measures |
| **Comment Subtopic:** A1. Pharmacotherapy Management of COPD Exacerbation (PCE) (Part C) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** A. New 2015 Measures |
| **Comment Subtopic:** A2. Initiation and Engagement of Alcohol and Other Drug Dependence Treatment (IET) (Part C) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** A. New 2015 Measures |
| **Comment Subtopic:** A3. Special Needs Plan (SNP) Care Management (Part C SNPs) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** A. New 2015 Measures |
| **Comment Subtopic:** A4.Medication Therapy Management Program Completion Rate for Comprehensive Medication Reviews (Part D) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** B. Changes to Current Measures |
| **Comment Subtopic:** B1.Breast Cancer Screening (Part C) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** B. Changes to Current Measures |
| **Comment Subtopic:** B2.Annual Flu Vaccine (Part C) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** B. Changes to Current Measures |
| **Comment Subtopic:** B3.High Risk Medication (Part D) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** B. Changes to Current Measures |
| **Comment Subtopic:** B4.Medication Adherence for Diabetes Medications (Part D) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** B. Changes to Current Measures |
| **Comment Subtopic:** B5. Appeals Upheld (Part D) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** B. Changes to Current Measures |
| **Comment Subtopic:** B6.MPF accuracy (Part D) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** B. Changes to Current Measures |
| **Comment Subtopic:** B7.Beneficiary Access and Performance Problems (Part C and D) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** B. Changes to Current Measures |
| **Comment Subtopic:** B8.Medication Adherence Measures (Part D) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** B. Changes to Current Measures |
| **Comment Subtopic:** B9.Obsolete NDCs |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** C. Retirement of Measures |
| **Comment Subtopic:** Glaucoma Testing (Part C) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** D. Contracts with Low Enrollment |
| **Comment Subtopic:** Not applicable |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** E. Data Integrity |
| **Comment Subtopic:** Not applicable |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** F. Changes for Measures Posted on the CMS Display Page |
| **Comment Subtopic:** F1. CAHPS measures about contact from a doctor’s office, health plan, pharmacy, or prescription drug plan (Part C) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** F. Changes for Measures Posted on the CMS Display Page |
| **Comment Subtopic:** F2.CAHPS – Complaint Resolution (Part C and D) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** F. Changes for Measures Posted on the CMS Display Page |
| **Comment Subtopic:** F3. CAHPS – Health Information Technology – EHR measures (Part C) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** F. Changes for Measures Posted on the CMS Display Page |
| **Comment Subtopic:** F4. Transition monitoring (Part D) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** F. Changes for Measures Posted on the CMS Display Page |
| **Comment Subtopic:** F5.Combined MPF Price Accuracy (Part D) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** F. Changes for Measures Posted on the CMS Display Page |
| **Comment Subtopic:** F6.Disenrollment Reasons (Part C and D) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** F. Changes for Measures Posted on the CMS Display Page |
| **Comment Subtopic:** F7.Drug-Drug Interactions Measure (Part D) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

1. **Comments to CMS Proposed Potential Changes to the CY 2016 Star Ratings**

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| **Comment Topic:** G. Forecasting to 2016 and Beyond |
| **Comment Subtopic:** G1. Changes in the Calculation of the Overall Rating and the Part C and D Summary Ratings |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** G. Forecasting to 2016 and Beyond |
| **Comment Subtopic:** G2.Expected Changes to Measure Specifications or Calculations - Osteoporosis Management in Women who had a Fracture (Part C) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** G. Forecasting to 2016 and Beyond |
| **Comment Subtopic:** G3.Expected Changes to Measure Specifications or Calculations - Monitoring Physical Activity (Part C) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** G. Forecasting to 2016 and Beyond |
| **Comment Subtopic:** G4.Expected Changes to Measure Specifications or Calculations - Plan All-Cause Readmissions (Part C) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** G. Forecasting to 2016 and Beyond |
| **Comment Subtopic:** G5.Expected Changes to Measure Specifications or Calculations - Improving Bladder Control (Part C) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

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| **Comment Topic:** G. Forecasting to 2016 and Beyond |
| **Comment Subtopic:** G6.Expected Changes to Measure Specifications or Calculations - Plan Makes Timely Decisions about Appeals (Part C) |
| **Comments (up to 5,000 characters):** |
| **Recommendations (up to 5,000 characters):** |

1. **Comments to Measurement concepts**

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| **Comment Topic:** H. Measurement Concepts |
| **Comment Subtopic:** H1. Alternatives to the individual measures’ current level of evaluation. For example instead of measures being rated for each contract, should some be evaluated at the plan (PBP) level, or at the parent organization level? Are there other associations of contracts within business entities that could also be a measurement level? |
| **Comments (up to 10,000 characters):** |
| **Recommendations (up to 10,000 characters):** |

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| **Comment Topic:** H. Measurement Concepts |
| **Comment Subtopic:** H2. Additional measures of care coordination focusing on how well providers and organizations coordinate services |
| **Comments (up to 10,000 characters):** |
| **Recommendations (up to 10,000 characters):** |

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| **Comment Topic:** H. Measurement Concepts |
| **Comment Subtopic:** H3. Measures of care transitions from one healthcare setting to another, for example, care transitions following hospital discharge |
| **Comments (up to 10,000 characters):** |
| **Recommendations (up to 10,000 characters):** |

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| **Comment Topic:** H. Measurement Concepts |
| **Comment Subtopic:** H4. Measures of patient-reported outcomes/intermediate outcomes collected through enrollee surveys, including additional ways to measure changes in health and mental health status. |
| **Comments (up to 10,000 characters):** |
| **Recommendations (up to 10,000 characters):** |

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| **Comment Topic:** H. Measurement Concepts |
| **Comment Subtopic:** H5. Measures that are condition-specific (e.g., mental health such as depression screening, HIV/AIDs, COPD, cancer, etc.). This may include one or more measures for a particular condition |
| **Comments (up to 10,000 characters):** |
| **Recommendations (up to 10,000 characters):** |

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| **Comment Topic:** H. Measurement Concepts |
| **Comment Subtopic:** H6. Combined member dissatisfaction measure – CMS is considering methodologies to combine available data sources of complaints and grievances. As an interim step, CMS may modify the CTM measurement period from 6 months of the current contract year to 12 months of the prior contract year. |
| **Comments (up to 10,000 characters):** |
| **Recommendations (up to 10,000 characters):** |

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| **Comment Topic:** H. Measurement Concepts |
| **Comment Subtopic:** H7. SNP-specific measures that would focus on any unique aspects of care provided by SNPs |
| **Comments (up to 10,000 characters):** |
| **Recommendations (up to 10,000 characters):** |

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| **Comment Topic:** H. Measurement Concepts |
| **Comment Subtopic:** H8. Alternative weighting of 1) the improvement measure(s) in order to further recognize organizations/sponsors’ efforts in improving quality. For example, increasing the improvement measure’s weighting as an outcomes measure (3x) to 4 or 5 times the weight of a process measure in order to reward lower-performing contracts’ strides to raise their performance, and/or 2) the three Part D Medication Adherence measures. |
| **Comments (up to 10,000 characters):** |
| **Recommendations (up to 10,000 characters):** |

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| **Comment Topic:** H. Measurement Concepts |
| **Comment Subtopic:** H9. Alternative methodologies for measuring improvement. |
| **Comments (up to 10,000 characters):** |
| **Recommendations (up to 10,000 characters):** |

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| **Comment Topic:** H. Measurement Concepts |
| **Comment Subtopic:** H10. Feasibility of replicating current HEDIS measures by using FFS administrative data – CMS is interested in evaluating stand-alone PDPs’ performances in areas that traditionally are based on medical record reviews. |
| **Comments (up to 10,000 characters):** |
| **Recommendations (up to 10,000 characters):** |

1. **OTHER Comments**

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| **Comment Topic (up to 5,000 characters):** |
| **Comments (up to 10,000 characters):** |
| **Recommendations (up to 10,000 characters):** |