



CENTERS FOR MEDICARE & MEDICAID SERVICES

DATE: August 24, 2015

TO: Medicare-Medicaid Plans

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SUBJECT: Final Contract Year 2015 California State-Specific Reporting Requirements

In June 2015, CMS released a memo requesting comments on the updated Medicare-Medicaid Capitated Financial Alignment Model Reporting Requirements: California-Specific Reporting Requirements. Below is a high-level summary of the changes that were made to the reporting requirements based on the comments received and the release of the quality withhold technical notes for Demonstration Year 1 for the California-specific measures.

For information about due dates for reporting based on the updated measure specifications, see page 3 of this memorandum.

Please contact the Medicare-Medicaid Coordination Office at mmcocapsreporting@cms.hhs.gov if you have any questions.

Summary of Changes

Introduction

- The Core Measure 9.2 guidance was revised to remove the statement that MMPs should determine if members met the nursing facility level of care as of the first day of the current reporting period. Additional clarification regarding Core 9.2 reporting will be forthcoming.
- Revised the “Guidance on HRAs and ICPs for Members with a Break in Coverage” to clarify that if an MMP prefers to conduct HRAs on all re-enrolled members regardless of health status, the MMP may continue to do so. Also revised this guidance to clarify how

MMPs should classify re-enrolled members who refused to provide an update on their health status or who cannot be reached by the MMP.

Measure CA1.6

- The Demonstration Year 1 quality withhold benchmark was added to the QA Checks/Thresholds section.
- The Notes section was revised to clarify that MMPs should only count members in data element C when the discussion of care goals with the member is clearly documented in the member's ICP. Also clarified that MMPs should only include ICPs in data element F when a new or previously documented care goal is discussed with the member and is clearly documented in the member's revised ICP.

Measure CA1.7

- The Demonstration Year 1 quality withhold benchmark was added to the QA Checks/Thresholds section.
- Revised the footnote to clarify that MMPs have the flexibility to determine the most feasible method of attestation; however, regardless of the method used, DHCS requires that MMPs document that the attestation was received.

Measure CA1.12

- The Demonstration Year 1 quality withhold benchmark was added to the QA Checks/Thresholds section.

Measure CA2.2

- The Demonstration Year 1 quality withhold benchmark was added to the QA Checks/Thresholds section.

Measure CA3.1

- Removed data element C and clarified in the Notes section that MMPs must continue to follow the process promulgated by DHCS for conducting assessments of ADA physical access compliance per the FSR/PAR DPL 14-005. This includes using the same provider site assessment tool that is used for conducting the Medi-Cal Facility Site Reviews (FSR) and Physical-Accessibility Reviews (PAR).
- The Demonstration Year 1 quality withhold benchmark was added to the QA Checks/Thresholds section.
- In the Analysis section, revised data element A to remove the requirement to include a description of how non-compliant findings are remediated. Instead, MMPs must include a description of steps taken in response to identification of issues.

- In the Notes section, removed the requirement that the Physical Access Compliance or Quality Officer must report to the MMP Compliance Officer.

Reporting Due Dates

Given the delay in releasing the updated California State-Specific Reporting Requirements, we are modifying the reporting frequency and due dates for certain measures as follows:

- Calendar Year (CY) 2014 reporting for measures CA1.7, CA2.2, CA3.1, and CA4.3 will be due on November 2, 2015.
- Quarterly reporting for measures CA1.1, CA1.2, CA1.3, CA1.4, and CA1.5 will be required retroactive to Quarter 1 2015. The first three quarters of CY 2015 for measures CA1.1, CA1.3, and CA1.5 will be due on November 30, 2015. The first three quarters of CY 2015 for measures CA1.2 and CA1.4 will be due on December 31, 2015.
- For the California MMP that is currently in the implementation period, monthly reporting of measures CA1.1, CA1.2, CA1.4, and CA1.5 will be required starting with the October 2015 reporting period. Monthly reporting of measure CA1.3 will be required starting with the November 2015 reporting period. Refer to the reporting requirements for information about the due dates for these measures.
- For all other measures, California MMPs are not required to resubmit historic data based on the updated specifications. However, California MMPs should use the updated specifications for all reporting periods going forward.