

Via Electronic Submission ([www.regulations.gov](http://www.regulations.gov))

January 15, 2018

Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
ATTN: CMS-4182-P  
P.O. Box 8013  
Baltimore, MD 21244-8013

***Re: Proposed Rule: Contract Year 2019 Policy and Technical Changes to Medicare Advantage – CMS-4182 P***

Dear CMS Administrator:

Froedtert Health welcomes this opportunity to comment on the Centers for Medicare & Medicaid Services (CMS's) proposed rule entitled, *Medicare Program Contract Year 2019 Policy and Technical Changes to Medicare Advantage, Medicare Cost Plan, Medicare Fee-for-Service, the Medicare Prescription Drug Benefit Programs, and the PACE Program 82 Fed. Reg 227 (November 28, 2017)*.

As a not-for-profit healthcare provider in SE Wisconsin, I am writing in support of the Proposed Rule entitled, *Reducing the Burden of the Compliance Program Training Requirements (422.503 and 423.504)*. I applaud CMS for listening and responding to the healthcare provider community regarding our concerns centered around the unnecessary burden that this training requirement has placed on us. Froedtert has a well-established compliance & ethics program that includes annual compliance training to its workforce. The CMS compliance training requirement is in many ways burdensome and unnecessary. The Compliance training content is duplicative as our own compliance training content is more detailed and specific to our organization and therefore, by having to provide the CMS compliance training, it added yet another training requirement onto our providers and staff. Also, it is very burdensome to have to spend time reviewing and responding to numerous different sponsoring organizations requirements.

As a well-respected healthcare provider in SE Wisconsin, including three hospitals/804 beds, dozens of outpatient locations/965,962 outpatient visits per year, we have a strong foundation of quality and integrity and always strive to operate our business in an ethical and compliant manner. Although we can appreciate the intent of the initial requirement, Compliance is already engrained in our culture and is something that we refresh and provide education on ourselves in a much more effective way for our organization.

In conclusion, I appreciate your time and attention to this and look forward to this section of the rule finalizing as is. If you have questions regarding the comments provided, please contact me at 414-777-7199.

Sincerely

Rhonda Joseph  
Froedtert Health, Compliance & Privacy Manager  
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