

**From:** Moctezuma, Lorraine [<mailto:Lorraine.Moctezuma@ibx.com>]

**Sent:** Tuesday, January 13, 2015 3:04 PM

**To:** CMS PartC&DStarRatings

**Cc:** Jones, Violet; Ramalingam, Subbu

**Subject:** Re: ACTION: Public Posting of RFI Submissions on CMS Website - Action needed by 1/16/2015

Good Afternoon,

We have taken the action steps noted in the email below, and we are sending this updated submission with a line item removed from our original submission. Please use the following updated detail from Independence Blue Cross:

**Independence Blue Cross would like to thank CMS for the opportunity to give input on the effect of dual members on Medicare Star Ratings as per the CMS HPMS memorandum, "Request for Information: Data on Differences in Medicare Advantage (MA) and Part D Star Rating Quality Measurements for Dual-Eligible versus Non-Dual-Eligible Enrollees".**

**Although Independence Blue Cross does not have research on whether dual status causes lower measure scores, we looked at the difference in health outcomes between Dual and Non-Dual members for a sampling of HEDIS hybrid measures. Since our dual population is too small for statistical analysis, we compared ratings between the total population and non-dual population. For all three contracts (H3952 -Keystone 65, H3909 -Personal Choice 65, H3156- AmeriHealth 65 NJ) there were no significant differences in Star rating outcomes.**

**We appreciate the opportunity to provide comments. Please e-mail us if you have any questions and we would be happy to respond.**

Thank you,

**Lorraine Moctezuma**

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