

CMS Comment Processing BPA Background

The High Priority Regulation and Comment Analysis Support for CMS supports the evolving healthcare regulatory landscape by providing access to fast-paced analysis of public comments, analysts with subject matter expertise, and a flexible management process. The contract supports services for processing public comments from forums including, but not limited to, rulemaking; Request for Information (RFIs); and, listening sessions; as well as technical assistance including analysis, policy reviews, and quality management, where necessary.

About Ripple Effect®

Ripple Effect has more than a decade of experience providing end-to-end policy analysis and comment processing services focused on healthcare and scientific research topics. In the last three years, Ripple Effect has supported a dozen CMS NPRMs, final rules, and RFIs, totaling more than 35,000 comments with an average of 11 days to complete an analysis.

Ripple Effect supplements our full-time research and evaluation team with comment processing technology and an on-call employee workforce of approximately 80 master's- and PhD-level analysts from health, public health, and policy disciplines. Our team is geographically spread across the time zones of the United States, and many of them prefer flexible schedules, resulting in highly efficient operations and around-the-clock analyses.

Benefits of Using the CMS Comment Processing BPA

- ✓ Single-award BPA allows for fast task order (TO) award time and streamlined support to meet aggressive timelines
- ✓ Pre-negotiated discounted labor rates provide administrative ease at best value
- ✓ Scope supports entire public comment lifecycle, including rule writing, comment processing, summarization, and reporting
- ✓ Trained and experienced workforce provide proven, low-risk support
- ✓ Small Business set-aside classification supports CMS contracting goals

Points of Contact

Ripple Effect POC:

Kristy Riordan, PhD

Senior Director, Research and Evaluation

512-934-3164 (m)

kriordan@rippleeffect.com

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CMS POC:

Angela D. Morris,

COR III, FAC -P/PM III, Scrum Master

Business Operations Staff (OSORA)

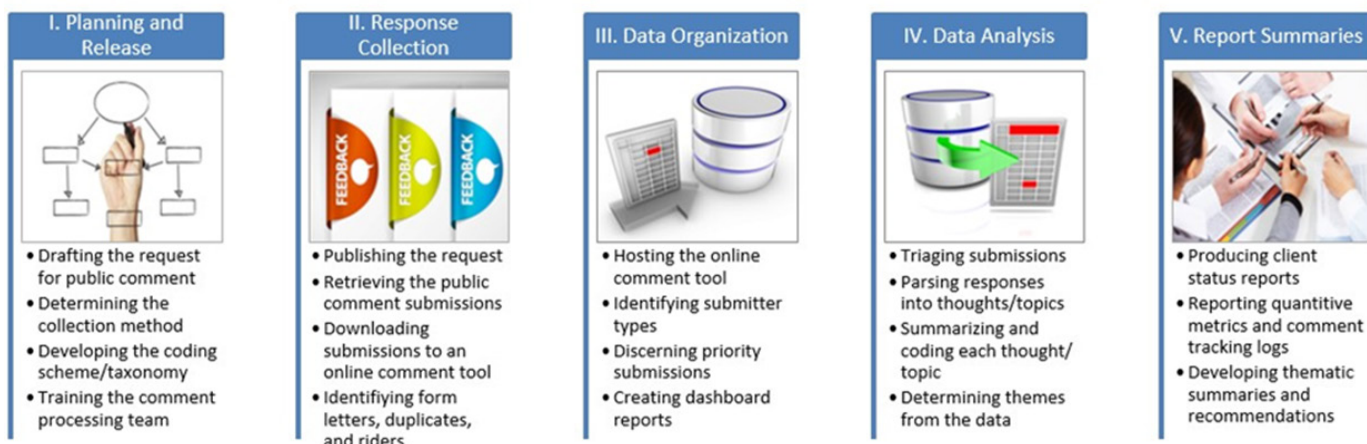
410-868-7838 (m)

Angela.Morris@cms.hhs.gov

COMMENT PROCESSING AND TECHNICAL ASSISTANCE INCLUDING ANALYSIS

- **Report Template Development:** Finalize the format of the deliverable templates, confirm the taxonomy for each required activity or forum, and finalize the order for processing extracts for each activity or forum.
- **Comment Review and Categorization:** Download from FDMS, process, triage, track, review, analyze, and summarize every individual comment received using a comment tracker log, including all topic(s) addressed, specifically including the issue and the taxonomy or develop taxonomy as required.
- **Comment Analysis and Summary:** Submit a granular comment log report and usable summaries of comments and analyze the comments to identify themes, sub-themes, patterns, and potential policy conflicts with existing policy.

Ripple Effect's five-step process to facilitate the solicitation, receipt, analysis, and reporting of public comments



POLICY ANALYSIS AND RECOMMENDATIONS DEVELOPMENT

- **Policy Analysis Briefing:** Conduct policy analysis through literature research, environmental scans, and identifying proven-effective practices.
- **Policy Analysis White Papers:** Identify and develop recommendations based on policy analysis, understanding of CMS's priorities, the healthcare environment, and the comment processing analysis, and present recommendations in a white paper(s) or other forms as needed.

QUALITY CHECKS OF RULE MAKING ACTIVITIES AND ARTIFACTS

- Provide a thorough review of preamble, regulations, and other text for spelling, grammar, formatting, and correct references and citations, along with accurate nomenclature and appropriateness of response, including tone/sentiment, to public commenters.