



UNIFORM MANAGED CARE MANUAL

CHAPTER 5.3.13.3

Medicare-Medicaid Dual Demonstration (MMDD) Medical Loss Ratio (MLR) Report Instructions

Version 2.0.1

Effective Date: June 25, 2021

Applicability of Chapter 5.3.13.3

This chapter applies to Medicare-Medicaid Plans (MMPs) participating in the Dual Demonstration. In this chapter, references to "Medicare and Medicaid" or the "Medicaid Managed Care Program(s)" apply to the Dual Demonstration.

Report Schedule

Each MMP must submit an annual medical loss ratio (MLR) report in accordance with these instructions and the "Resource Documents" listed in the Report Template section below. The first Report due under this chapter shall include the results of SFY 2018 and will be due as outlined in Section II.C. Table 2. MLR Reporting Schedule of these instructions. MMPs should file an aggregate MLR report (Report) for all plan codes.

Report and MLR Calculation Overview

The Report expresses the ratio of MCO incurred claims, including quality improvement expenditures, to premium payments received, adjusted for Federal, State, and local taxes and licensing and regulatory fees. For each completed SFY, the Report collects data regarding certain medical expenses incurred by the MCO, along with some related expenses and adjustments, which in total are compiled into a "numerator." Per CMS rules, some of the amounts included in the adjusted medical expenses are not actual direct beneficiary services. The Report also

collects data regarding certain premium payments made to the MCO, along with certain related amounts and adjustments, which in total are compiled into a "denominator." The defined numerator is then divided by the defined denominator, and a ratio is calculated, which may then be further adjusted by a creditability adjustment factor. This final ratio is the MLR. This ratio or percentage may be expressed as a simple number, whereby, for example, a ratio of 0.85, or 85%, may be expressed simply as an MLR of 85. Additional digits may be used; for example, an MLR of 85.1.

Calculation on a post-Experience Rebate basis.

MLR results will be reported on a post-Experience Rebate basis. This means that the Experience Rebate, if any, will be part of the calculation; an Experience Rebate reduces the total amount of premiums in the capitation. HHSC interest assessments, if any, are unallowable costs under the Cost Principles and are neither medical expenses nor premium payments. As such, they will not be included in the MLR calculation.

Implications of the Administrative Expense Cap and Reinsurance Cap.

The Administrative Expense Cap should not directly impact the Report, other than indirectly, via the Cap's possible impact on the amount of Experience Rebate payable. Any reinsurance amounts deemed unallowable via the Reinsurance Cap may impact the Report.

Consolidation

If an MCO contracts with HHSC under more than one legal name, then the MCO should complete a consolidated Report including all such legal entities, across all MMP Service Areas. **Implications of results.** While there may be target MLR levels to achieve, there is no monetary impact, such as rebates, awards, or recoupments, associated with the MLR level attained for a given SFY by a given MCO. HHSC assesses a monetary impact instead via the Experience Rebate methodology, which serves a similar purpose.

Report Template

I. Background

Medicare-Medicaid Plans (MMPs, also known as STAR+PLUS MMPs) participating in the Texas Dual Eligibles Integrated Care Demonstration

Project (the Demonstration) must submit to the Centers for Medicare & Medicaid Services (CMS) and the Texas Health and Human Services Commission (HHSC) their Medical Loss Ratio (MLR) for coverage provided in the capitated financial alignment demonstration. MLR is the portion of plan revenues that are spent on claims and activities that improve health care quality. MMPs participating in the Demonstration are required to submit their MLR for all state fiscal years beginning with SFY 2018 (September 1, 2017, through August 31, 2018). Texas MMPs will report their MLR on a state fiscal year (September 1 – August 31), rather than Demonstration Year, basis.

This document provides instructions on submitting MLR reports for Texas MMPs participating in the Demonstration periods as shown below in Section II.A. Table 1. The instructions generally follow CMS’s MLR Report Filing Instructions for Medicare Advantage Organizations (MAOs) and Part D Prescription Drug Plan sponsors (MAPDs). However, the instructions also incorporate state-specific variations to address Medicaid-related issues not anticipated by CMS’s MLR Report Filing Instructions for MAOs and MAPDs, as well as requirements per the three-way contract. Please note that in cases where these instructions do not provide detail, the detailed guidance for each line item included in CMS’s MLR Report Filing Instructions for MAOs and MAPDs applies. Additional information on Quality Improvement (QI) activities can be found in Appendix A of this document.

A. Resource Documents

The guidance articulated below was developed from the following source documents:

- 42 CFR Part 422, Subpart X (for Medicare Advantage organizations) & Part 423, Subpart X (for Part D plan sponsors)
- CMS’s MLR Report Filing Instructions for MAOs and MAPDs for CY2014, CY2015, CY2016, CY2017, and CY2018 available at: <https://www.cms.gov/Medicare/Medicare-Advantage/Plan-Payment/medicallossratio.html>
- The three-way contract for the Demonstration, available at: <https://www.cms.gov/Medicare-Medicaid-Coordination/Medicare-and-Medicaid-Coordination/Medicare-Medicaid-Coordination-Office/FinancialAlignmentInitiative/Downloads/TXContract08012017.pdf>

- Medicare Program; Medical Loss Ratio Requirements for the Medicare Advantage and the Medicare Prescription Drug Benefit Programs; Final Rule, 78 Fed. Reg. 31284 (May 23, 2013), available at <https://www.gpo.gov/fdsys/pkg/FR-2013-05-23/pdf/2013-12156.pdf>
- Medicaid and Children’s Health Insurance Program (CHIP) Programs; Medicaid Managed Care, CHIP Delivered in Managed Care, and Revisions Related to Third Party Liability; Final Rule, 81 Fed. Reg. 27498 (May 6, 2016), available at <https://www.gpo.gov/fdsys/pkg/FR-2016-05-06/pdf/2016-09581.pdf>

II. MLR Coverage Period and Reporting Schedule

A. Coverage Period

The MLR coverage periods for MMPs participating in the Demonstration are as follows:

Table 1. MLR Coverage Periods

COVERAGE PERIOD	DEMONSTRATION YEARS	CALENDAR DATES
Coverage Period 1	Partial 2, partial 3	September 1, 2017 to August 31, 2018
Coverage Period 2	Partial 3, partial 4	September 1, 2018 to August 31, 2019
Coverage Period 3	Partial 4, partial 5	September 1, 2019 to August 31, 2020 ¹

¹ End date of Coverage Period 3 may be adjusted pending Demonstration end date.

B. Claims Runout

The MLR for each Coverage Period shall be calculated using claims incurred during the coverage period and paid through 11 months after the end of the coverage period.

C. Reporting Schedule

For Coverage Period 1 and beyond, MMPs will follow the reporting schedule below. Following submission of the Report, CMS will have ninety (90) days to review and work with HHSC to finalize the MLR calculation. Subsequently, the MMP will have sixty days (60) to review the final MLR calculation.

Table 2. MLR Reporting Schedule (*Due dates pending completion of quality withhold analysis for the applicable coverage year. Due dates may be extended by CMS and HHSC at a later date*)

COVERAGE YEAR	CALENDAR DATES	MLR REPORT DUE	CMS AND HHSC REVIEW COMPLETE	MMP REVIEW PERIOD COMPLETE
Year 1 (SFY 2018)	September 1, 2017 to August 31, 2018	April 1, 2021	June 30, 2021	August 31, 2021
Year 2 (SFY 2019)	September 1, 2018 to August 31, 2019	August 31, 2021	October 31, 2021	December 31, 2021
Year 3 (SFY 2020)	September 1, 2019 to August 31, 2020	June 30, 2022	August 31, 2022	October 31, 2022

Note that the Report is completed at one point in time and will not be revised or restated at any later date. This means that the MLR will not be updated or recomputed at a later date.

III. MLR Calculation

The MLR is the portion of revenue, less taxes and regulatory fees, that is spent on claims and on activities that improve health care quality (QI), which include care coordination. That is,

$$MLR = \left(\frac{(Claims + Quality Improvement)}{(Revenue - Taxes \& Regulatory Fees)} \right) + Credibility Adjustment$$

Prior to adding the Credibility Adjustment to the calculation, the calculated MLR is referred to as the “unadjusted” (i.e., prior to credibility adjustment) MLR. CMS’s MLR regulations for MA and Part D contracts increase a contract’s calculated MLR by a Credibility Adjustment factor to account for the inherent claim fluctuations for contracts with low enrollment. A Credibility Adjustment factor will also be added to the MLR calculation for MMPs. As a result, MMPs will add an amount—between 1.0% and 8.4%—to their “unadjusted” MLR to determine their MMP MLR. See the MLR Credibility Adjustment Section M below for more detail. The MLR shall be expressed as a percentage rounded to the second decimal point.

IV. MLR Instructions for MMPs

a. Submission of MLR Reports

MMPs should submit their MLR reports via email to CMS at mmcocapsmodel@cms.hhs.gov and to HHSC per UMCM Chapter 5.0.1 - Deliverables Requirements Matrix. Use the following naming convention for the MLR Report Tool and Attestation for the files:

- HXXXX-Contract Name-SFY2018-TX-MLR-Date.xlsx
- HXXXX-Contract Name-SFY2018-TX-MLR-Attestation-Date.pdf.

b. Accounting Principles

MMPs should use Statutory Accounting Principles to explain how revenue is used to pay for non-claims expenditures. Non-claims and QI expenses should be those allocated specifically to the MMP contract. However, if this is not feasible, then the MMP must apportion the costs using a generally accepted accounting method that yields the most accurate results.

Expenses for QI activities are added to incurred claims in the MLR calculation. MMPs must indicate which activities qualify to be treated as QI for MLR reporting purposes. MMPs may choose to comply with CMS’s MLR guidance for Medicare plans or for Medicaid plans. MMPs should indicate in Item 3 of “Expense Methodology” in the Report form that QI expenses are “compliant with CMS’s MLR guidance for Medicare/Medicaid plans.” (Choose one.)

Information regarding CMS and HHCS guidance on reporting QI expenses in MLR reports can be found in Appendix A.

c. Reporting Level for MMPs

MMPs should report their MLRs at a state-wide level. The Report should include Medicare (inclusive of Medicare Parts A/B and Part D) and Medicaid combined. All Plan Benefit Packages (PBPs) under a state contract should be combined for MLR reporting.

d. Allocation of Expenses

Expenses must be allocated in accordance with the provisions in 42 CFR §§ 422.2420(d) and 423.2420(d).

e. Commercial Reinsurance

Contractors may not adjust the MLR for commercial reinsurance. Commercial reinsurance premiums and recoveries are excluded from

the MLR calculation. Both costs and revenues must be reported on a direct basis (i.e., before ceded reinsurance) as required under §§ 422.2420(b)(2)(i) and 423.2420(b)(2)(i), and §§ 422.2420(c)(1) and 423.2420(c)(1).

f. Sequestration

Medicare Sequestration amounts are entered as negative amounts in Lines 1.0a (Medicare Parts A and B) and 1.0b (Part D). The expectation—for years in which sequestration applies—is that sequestration amounts will be approximately 2% of the applicable CMS plan payments to MMPs.

For Part D, the 2% sequestration is applied only to the non-premium portion of the risk-adjusted National Average Monthly Bid Amount (NAMBA).¹ Note, starting with CY 2015, the “Direct Subsidy” field of the Monthly Membership Reports (MMR) includes the full risk-adjusted NAMBA, i.e., the combined premium and non-premium portions. Therefore, for estimating Part D sequestration, MMPs can estimate the premium portion by multiplying the Low-Income Premium Subsidy Amount (LIPSA) by the MMR member months and subtract that amount from the amount reported in the “Direct Subsidy” field prior to multiplying by 2% to estimate Part D sequestration, as follows:

Non – Premium Portion of Risk Adjusted NAMBA

$$= \left(\sum_{\substack{\text{Coverage} \\ \text{Period}}} \text{Direct Subsidy} \right) - \left(\text{LIPSA} \times \sum_{\substack{\text{Coverage} \\ \text{Period}}} \text{member months} \right)$$

¹ See the March 11, 2015 Health Plan Management System (HPMS) memo from Cheri Rice and Tim Engelhardt, “CMS Update on Medicare Parts A/B and Part D Payments to Medicare-Medicaid Plans for Contract Year 2015.” HPMS memos may be found here: <https://www.cms.gov/Research-Statistics-Data-and-Systems/Computer-Data-and-Systems/HPMS/HPMS-Memos-Archive-Annual-Items/SysHPMS-Memo-Archive-%3F2015-Qtr1>. Plans can also access these memos directly through HPMS.

Part D Sequestration

$$= 2\% \times \left(\left(\sum_{\substack{\text{Coverage} \\ \text{Period}}} \text{Direct Subsidy} \right) - \left(\text{LIPSA} \times \sum_{\substack{\text{Coverage} \\ \text{Period}}} \text{member months} \right) \right)$$

g. Revenue

Revenues must be reported for MLR purposes using all applicable categories in this section. The categories are derived from MLR instructions for MAPD plans; some categories may not be applicable to MMPs.

- Medicare Revenue – enter payments made to the MMP for the coverage period in the following categories (as applicable):
 - o Capitation Payments for A/B services, using final risk scores
 - o Capitation Payments for Part D, using final risk scores
 - o Part D federal reinsurance subsidy (prospective and reconciliation adjustments)
 - o Part D Low Income Premium Subsidy Amount (LIPSA)
 - o Part D risk corridor payments
 - o Note that Low Income Cost Sharing subsidy (LICS) and Coverage Gap Discount Program (CGDP) payments are not included in MLR reporting and are excluded from the numerator and denominator in MLR calculations.
 - o Note that Experience Rebates will be treated as a reduction in revenues in the MLR denominator.

- Medicaid Revenue
 - o Capitation Payments for Medicaid covered services
 - o Other Medicaid Revenue
 - o Note that Experience Rebates will be treated as a reduction in revenue in the MLR denominator.

- Quality Withhold: Any amounts not earned back as part of the MMP Quality Withhold are excluded from the Medicare and Medicaid Revenue. Quality withhold amounts earned back are included as an adjustment to revenue.

- Revenue information included in the Report will be compared to internal CMS data (including Monthly Membership Detail Data Files (MMDDF) and Payment Reconciliation System (PRS) Reconciliation Results Report to Plans, Contract Trailer "CTR" version (PRS CTR) data) and to State data to verify the accuracy of the submitted data.

h. Claims

Enter the MMP's claims expenses for the reporting period.

1. Incurred Claims

Incurred claims for clinical services and prescription drug costs must include the following:

- Direct claims that the MMP pays to providers (including under capitation contracts with physicians or other providers) for covered services provided to any enrollees under the contract, including any services purchased in lieu of more-costly Covered Services, as defined by the three-way contract. Refer to page 6 of the CMS's MLR Report Filing Instructions for MAOs and MAPDs for CY2014, CY2015, CY2016, CY 2017, and CY2018 available at: <https://www.cms.gov/Medicare/Medicare-Advantage/Plan-Payment/medicalllossratio.html> for treatment of payments to third party vendors.
- Service Coordination Expense. That portion of the personnel costs for Care Coordinators whose primary duty is direct enrollee contact that is attributable to this Contract shall be included as a Benefit Expense. That portion of the personnel costs for Contractor's Medical Director that is attributable to this Contract shall be included as a Benefit Expense.
- Direct drug costs that are actually paid by the MMP, net of prescription drug rebates and other direct and indirect remuneration. (Note: this is consistent with the CMS's MLR Report Filing Instructions for MAOs and MAPDs for CY2014, CY2015, CY2016, CY 2017, and CY2018 available at: <https://www.cms.gov/Medicare/Medicare-Advantage/Plan-Payment/medicalllossratio.html> for treatment of payments to third party vendors as noted on p. 6)
- Unpaid claims reserves for the reporting period, including claims reported in the process of adjustment.
- Quality withholds from payments made to contracted providers. For example, a plan that uses a 2% quality withhold from

provider payments, must include that 2% in the incurred claims reported for MLR purposes; the plan does not have the option of excluding this 2% from MLR incurred claims (even if the 2% was NOT paid out).

- Incurred but not reported claims based on past experience and modified to reflect current conditions such as changes in exposure, claim frequency, or severity.
- Changes in other claims-related reserves.
- Claims that are recoverable for anticipated coordination of benefits.
- Claims payments recoveries received as a result of subrogation.
- Claims payments recoveries as a result of fraud reduction² efforts, not to exceed the amount of fraud reduction expenses. Adjustments that must be deducted from incurred claims include overpayment recoveries received from providers.

2. Exclusions from Incurred Claims

The following amounts must not be included in incurred claims:

- Non-claims costs, as defined in §§ 422.2401 and 423.2401, which include the following:
 - Amounts paid to third party vendors for secondary network savings.
 - Amounts paid to third party vendors (for any of the following):
 - Network development.
 - Administrative fees.
 - Claims processing.
 - Utilization management.
 - Amounts paid, including amounts paid to a provider or pharmacy, for professional or administrative services that do not represent compensation or reimbursement for covered services provided to an enrollee, such as the following:
 - Medical record copying costs.
 - Attorneys' fees.
 - Subrogation vendor fees.

² Fraud reduction includes fraud prevention and fraud recovery. 78 Fed. Reg. 31294 available at <https://www.govinfo.gov/content/pkg/FR-2013-05-23/pdf/2013-12156.pdf>.

- Bona fide service fees.
- Compensation to any of the following:
 - Paraprofessionals.
 - Janitors.
 - Quality assurance analysts.
 - Administrative supervisors.
 - Secretaries to medical personnel.
 - Medical record clerks.

i. Federal and State Taxes and Licensing or Regulatory Fees

Federal and State taxes and assessments and licensing or regulatory fees must be reported in accordance with the provisions in §§ 422.2420(c)(2) and 423.2420(c)(2).

j. Health Care Quality Improvement (QI) Expenses

MMPs may use Medicare or Medicaid guidance on which activities and expenses qualify as QI, consistent with Appendix A below. Care coordination expenses should be reported as a QI expenses, under line 4.1 Improve health outcomes.

For reference, the regulations at §§ 422.2430(a) and 423.2430(a) define the expenditures and activities that improve health care quality and can therefore be reported as such for MLR purposes by MAO and Part D Prescription Drug Plan sponsors.

k. Non-Claims Costs

Non-claims costs, as defined in §§ 422.2401 and 423.2401, are those expenses for administrative services that are not:

- (1) Incurred claims (as provided in §§ 422.2420(b)(2) through (4) and 423.2420(b)(2) through (4));
- (2) Expenditures on quality improving activities (as provided in §§ 422.2430 and 423.2430);
- (3) Licensing and regulatory fees (as provided in §§ 422.2420(c)(2)(ii) and 423.2420(c)(2)(i));
- (4) State and Federal taxes and assessments (as provided in §§ 422.2420(c)(2)(i) and (iii), and 423.2420(c)(2)(ii) and (iii)).

l. Total Member Months

Enter the member months associated with the contract. Member months entered should be on a consistent basis with the revenue and claims information reported.

m. MLR Credibility Adjustment

Per §§ 422.2440 and 423.2440, an MMP may add a credibility adjustment factor as published in the Final Rate Announcement for MA-PD Contracts for the applicable payment years to its calculated MLR if the contract's experience is partially credible. See the Excel MMP MLR template, the table reflects the 2020 credibility adjustment factors³ however, these factors may be subject to change for future periods. Note, the credibility adjustment factor will be calculated automatically based on the member months provided in the Excel MMP MLR template spreadsheet. For those reporting periods for which a contract has non-credible experience, as determined per the table referenced above, an MLR report must still be submitted.

V. Attestation

An attestation must be submitted to accompany each MLR Report submitted to CMS and HHSC. See the Excel MMP MLR template tab "Attestation" and Section IV A. for the naming convention for the submitted attestation file. The attestation must be made by one of the following officers of the company: Chief Executive Officer (CEO), Chief Financial Officer (CFO), or Chief Operating Officer (COO).

VI. Audit

All line-items in the Report may be subject to HHSC's internal desk review process, and to audit in the annual FSR audits.

VII. Questions

Questions on these instructions and the associated reporting tool should be addressed to CMS at mmcocapsmodel@cms.hhs.gov and to HHSC at HHSC_MLR@hhsc.state.tx.us.

³ Information on the applicable credibility adjustment for each reporting year can be found at <https://www.cms.gov/Medicare/Health-Plans/MedicareAdvtgSpecRateStats/Announcements-and-Documents>.

Appendix A: Quality Improvement Activities

Expenses for Quality Improvement (QI) activities are added to incurred claims in the MLR calculation. MMPs must indicate which activities qualify to be treated as QI activities for MLR reporting purposes. MMPs must be prepared to show that such activities are consistent with Medicare or Medicaid guidance regarding QI activities.

CMS has issued rules on the treatment of QI with respect to MLR calculations:

- Medicaid and Children’s Health Insurance Program (CHIP) Programs: Medicaid Managed Care, CHIP Delivered in Managed Care, and Revisions Related to Third Party Liability; Final Rule, 81 Fed. Reg. 27498 (May 6, 2016), available at <https://www.gpo.gov/fdsys/pkg/FR-2016-05-06/pdf/2016-09581.pdf>.
- Medicare Program; Medical Loss Ratio Requirements for the Medicare Advantage and the Medicare Prescription Drug Benefit Programs; Final Rule, 78 Fed. Reg. 31284 (May 23, 2013), available at: <https://www.gpo.gov/fdsys/pkg/FR-2013-05-23/pdf/2013-12156.pdf>.

Below is relevant guidance excerpted from the above rule releases regarding 45 CFR 158.150, 42 CFR 422.2430, and 42 CFR 423.2430.

1. Medicaid QI Activities Guidance

We also proposed at § 438.8(e)(3) that an activity that improves health care quality can be included in the numerator as long as it meets one of three standards:

- (1) It meets the requirements in 45 CFR 158.150(b) (the private market MLR rule) for an activity that improves health care quality and is not excluded under 45 CFR 158.150(c);*
- (2) It is an activity specific to Medicaid managed care External Quality Review (EQR) activities (described in § 438.358(b) and (c)); or*
- (3) It is an activity related to Health Information Technology and meaningful use, as defined in 45 CFR 158.151 and excluding any costs that are deducted or excluded from incurred claims under paragraph (e)(2). Regarding activities related to Health Information Technology and meaningful use, we encouraged states to support the adoption of certified health information technology that enables interoperability across providers and supports seamless care coordination for enrollees. In addition, we referred MCOs, PIHPs, and*

PAHPs to the Office of the National Coordinator for Health Information Technology's 2016 Interoperability Standards Advisory (2016 ISA) published on November 6, 2015 (available at <https://www.healthit.gov/sites/default/files/2016-interoperability-standards-advisory-final-508.pdf>), which contains a list of the best available standards and implementation specifications enabling priority health information exchange use cases.

Because of our understanding that some managed care plans cover more complex populations in their Medicaid line of business than in their private market line(s) of business, we believed that the case management/care coordination standards are more intensive and costly for Medicaid managed care plans than in a typical private market group health plan. We proposed to use the definition of activities that improve health care quality in 45 CFR 158.150 to encompass MCO, PIHP, and PAHP activities related to service coordination, case management, and activities supporting state goals for community integration of individuals with more complex needs such as individuals using LTSS but specifically requested comment on this approach and our proposal not to specifically identify Medicaid-specific activities separately in the proposed rule. We indicated our expectation that MCOs, PIHPs, and PAHPs would include the cost of appropriate outreach, engagement, and service coordination in this category.⁴

2. Medicare QI Activities Guidance

Proposed sections 422.2420(b) and 423.2420(b) for MA and Part D contracts identify the elements to be included in the numerator for a contract's MLR. Sections 422.2420(b)(1) and 423.2420(b)(1) identify two basic elements that would constitute the MLR numerator: Incurred claims (as defined in paragraphs (b)(2) through (b)(4) for both programs) and expenditures under the contract for activities that improve health care quality, which are referenced at paragraph (b)(1)(iii) for both programs, and described in detail at sections 422.2430 and 423.2430.⁵

⁴ 81 Fed. Reg. 27522-23.

⁵ 78 Fed. Reg. 31288.

Table 2. DOCUMENT HISTORY LOG

STATUS¹	DOCUMENT REVISION²	EFFECTIVE DATE	DESCRIPTION³	STATUS¹
Baseline	2.0	February 1, 2021	Initial version Uniform Managed Care Manual Chapter 5.3.13.3, "Medicare-Medicaid Dual Demonstration (MMDD) Medical Loss Ratio (MLR) Report Instructions." This chapter applies to Medicare-Medicaid Plans (MMPs) in the Dual Demonstration	Baseline
Revision	2.0.1	June 25, 2021	Accessibility approved version.	Revision

¹ Status should be represented as "Baseline" for initial issuances and "Revision" for changes to the Baseline version.

² Revisions should be numbered according to the version of the issuance and sequential numbering of the revision—e.g., "1.2" refers to the first version of the document and the second revision.

³ Brief description of the changes to the document made in the revision.