



511 Farber Lakes Drive
Buffalo, NY 14221

August 18, 2020

Seema Verma, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

Submitted via www.regulations.gov

Re: Part C Medicare Advantage Reporting Requirements and Supporting Regulations in 42 CFR 422.516(a) (CMS-10261)

Dear Administrator Verma:

Thank you for the opportunity to comment on the proposed 2021 Part C Reporting Requirements for Additional Telehealth Benefits (CMS-10261). Independent Health Association (IHA) is a not-for-profit health plan that continually aims to provide our Western New York community with innovative health-care products and services, which enable affordable access to quality health care. Our award-winning customer service, dedication to quality health care and unmatched relationships with physicians and providers has allowed us to be consistently recognized as one of the highest-ranked health insurance plans in the nation. Additionally, IHA's HMO and PPO contracts each received an overall star rating of 4.5 in the 2020 star ratings. IHA offers Medicare Advantage Plans and Prescription Drug Plans. Please see our comments below.

IHA is supportive of the changes to the Additional Telehealth Benefits reporting section, as outlined in the CMS crosswalk document and the 2021 Part C Reporting Requirements

document. The changes outlined simplify the reporting process, thereby reducing administrative cost for plans and helping to keep premiums lower for beneficiaries.

Thank you again for the opportunity to comment and thank you for considering IHA's views on the proposed 2021 Part C Reporting Requirements for Additional Telehealth Benefits (CMS-10261) . If there are any questions or additional information is needed, please contact Jeremy Laubacker at Jeremy.Laubacker@independenthealth.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Dawn Odrzywolski". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dawn Odrzywolski
Vice President, Medicare Programs