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Submitted via Federal e-Rulemaking Portal: http://www.regulations.gov

January 8, 2021

Centers for Medicare & Medicaid Services
Office of Strategic Operations and Regulatory Affairs,
Division of Regulations Development, Room C4–26–05,
Attention: Document Identifier/OMB Control Number CMS–R–246,
7500 Security Boulevard, Baltimore, Maryland 21244–1850

Re: Medicare Advantage, Medicare Part D, and Medicare Fee-For-Service Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey

Dear CMS Desk Officer:

Anthem, Inc. (Anthem) appreciates the opportunity to provide comments on the Medicare CAHPS survey, as outlined by *Federal Register* notice dated November 9, 2020.

Anthem is one of the nation's leading health benefits companies, serving over 107 million people through its affiliated companies, including more than 43 million within its family of health plans. We aim to be the most innovative, valuable and inclusive partner. As one of the nation's leading health benefits companies, Anthem appreciates its partnership with the Centers for Medicare & Medicaid Services (CMS) to serve beneficiaries.

Anthem and its subsidiary health plans are committed to the Parts C and D Star Ratings program that empowers Medicare beneficiaries and their family members with meaningful information about quality and cost to make healthcare decisions. Given that beneficiaries rely upon the Star Ratings to make informed decisions, it is important that information is accurate and timely. We are concerned Star Ratings survey measures will be incomplete due to the pandemic.

Specifically, we are concerned the CAHPS questionnaire will not accurately capture our members' experience in obtaining and receiving care through all available modalities. Due to the Public Health Emergency and the changes to how members are interacting with healthcare providers, the 2021 versions of the Medicaid and Commercial CAHPS questionnaires have been updated to include "inperson, phone, or video" types of appointments. We recommend including such appointment types in the Medicare CAHPS questionnaires to account for the increase in telehealth appointments. We

encourage CMS to update the next 30-day PRA comment period with Medicare CAHPS documents containing all appointment types to ensure fairness and balance across Star Rating programs.

Anthem appreciates this opportunity to provide comments regarding the Medicare CAHPS surveys. Should you have any questions or wish to discuss our comments further, please contact Amanda Hurley at 202-508-7892 or Amanda.Hurley@anthem.com.

Sincerely,

Anthony Mader

Vice President, Public Policy

Anthem is a leading health benefits company dedicated to improving lives and communities, and making healthcare simpler. Through its affiliated companies, Anthem serves more than 107 million people, including approximately 43 million within its family of health plans. We aim to be the most innovative, valuable and inclusive partner. For more information, please visit www.antheminc.com or follow @AnthemInc on Twitter.