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To: Centers for Medicare and Medicaid Services
Submitted electronically via: <http://www.regulations.gov>

From: Jennifer McKenna
UnitedHealthcare
UnitedHealth Group

Date: January 8th, 2021

Attn: Document Identifier: CMS-R-246

Re: Agency Information Collection Activities: Proposed Collection; Comment Request

Attached for your consideration are UnitedHealthcare's comments regarding Agency Information Collection Activities: Proposed Collection; Comment Request put forth for comment on 11/09/2020.

Agency Information Collection Activities: CMS–R–246 Medicare Advantage, Medicare Part D, and Medicare Fee-For-Service Consumer Assessment of Healthcare Providers and Systems (CAHPS) Survey

UnitedHealthcare (UHC) is pleased to submit comments in response to the Centers for Medicare and Medicaid Services (CMS) request for approval to continue conducting the Medicare CAHPS surveys to meet the requirement to conduct consumer satisfaction surveys regarding the experiences of beneficiaries with their health and prescription drug plans.

We recognize the importance of capturing this information and believe it is important to collect the survey, even through the COVID-19 public health emergency, to help plans better understand how patient experience may have changed. Additionally, UHC has no issue regarding the burden estimates.

We do, however, have concerns for how the 2021 survey will be used to score plans for payment purposes. The CAHPS survey includes questions about follow-ups on lab results; meanwhile, healthcare offices, labs, etc. have implemented new policies around labs given the mass testing effort for COVID-19. Additionally, it will likely fall in the middle of an unprecedented mass vaccination effort where there may be confusion about who is eligible for vaccination and when and how that will vary by state. Using the better of the 2021 or 2019 surveys for the 2022 Star Ratings appropriately recognizes this reality while providing important information for plans and CMS to understand and improve on the patient experience going forward.

If you have any questions on these comments, please feel free to contact me at 952-931-5681.

Respectfully,

Jennifer McKenna

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Director, Regulatory Affairs
UnitedHealthcare