

April 6, 2021

Centers for Medicare and Medicaid Services
Attn: CMS-10203
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Submitted Electronically: www.regulations.gov

Re: Medicare Health Outcomes Survey (HOS)

Dear Sir/Madam:

UnitedHealth Group (UHG) is pleased to respond to the Centers for Medicare and Medicaid Service's (CMS) request for comments regarding the requests for renewed three-year clearance to continue annual fielding of the Medicare Health Outcomes Survey (HOS), published by CMS in the Federal Register on 02/05/2021.

UnitedHealth Group is a mission-driven organization dedicated to helping people live healthier lives and helping our health care system work better for everyone through two distinct business platforms – UnitedHealthcare, our health benefits business, and Optum, our health services business. Our workforce of 325,000 people serves the health care needs of 142 million people worldwide, funding and arranging health care on behalf of individuals, employers, and the government. We not only serve as one of the nation's most progressive health care delivery organizations, we also serve people within many of the country's most respected employers, in Medicare serving nearly one in five seniors nationwide, and in Medicaid supporting underserved communities in 31 states and the District of Columbia.

In the renewal request, CMS proposes the removal of six survey questions. UHG supports the removal of these questions to make the survey shorter. We ask CMS to evaluate and share the impact removal could have on the case mix adjustment. Though the three questions concerning common chronic medical conditions are not specifically related to Star Ratings, they could be impactful on Improving or Maintaining Physical Health (PCS). We seek further information on the impact to case mix adjustment.

Additionally, UHG supports CMS' proposed removal of the Osteoporosis Testing in Older Women (OTO) question from the HOS following recommendations made by the measure steward (NCQA), to keep the survey aligned with the latest U.S. Preventative Services Task Force (USPSTF) clinical recommendations. For the same reason, we also support CMS' proposed removal of the phrase "suggest you take vitamin D" from the falls prevention question.

UHG also requests CMS evaluate the impact of removing the questions used for the death case mix model portion of the case mix adjustment for Improving or Maintaining Physical Health. The SNP Alliance has written a white paper recommending gathering these variables from other data sources (<https://www.snpalliance.org/wp-content/uploads/2020/04/snpa-paone-hos-white-paper-final-dec-2018-1.pdf>). CMS should also explore removing the death case mix model from case mix adjustment. This would make the measure less complicated and the scores can be sensitive to the adjustment of observed and expected death rates. Depending on the results of this analysis, it would allow CMS to remove all of the health condition questions, further shortening the survey and increasing response rates.

Thank you for your thoughtful consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. Migliori", with a stylized flourish at the end.

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