

Comments: Model Medicare Advantage and Medicare Prescription Drug Plan Individual Enrollment Request Form

CMS – 10718, OMB 0938-1378

Comment #1

Please confirm that any changes finalized would be for CY2023 enrollment forms and that CMS would be releasing update enrollment chapter guidance that included the revised forms.

Comment #2

Please provide additional detail how the data in the new fields will be reported back to CMS and any other reporting that these data elements will be incorporated into.

Comment #3

What are CMS' expectations for how plans may use this data? We can see a use for this data with broader reporting and current plan initiatives in better understanding race and ethnicity within our Medicare Populations and addressing barriers.

Comment #4

We recommend CMS continue to leave the statement, 'do not enter a PO Box' on the enrollment form and allow plans to work with members experiencing homelessness on a case-by-case basis. Today, if a PO box is entered as the applicant's permanent address, we will outreach and confirm the address for the member. This outreach will provide an opportunity to understand the applicant's living scenario and if they are experiencing homelessness. Additionally, we ask CMS to consider adding a check box or field for an individual to indicate if they are experiencing homelessness or do not have stable housing – a question that justifies listing a PO box and allows targeted outreach to those that truly need the assistance.

To expand further, in most situations the applicant does have a permanent address that can be used. Removing the statement would increase the volume of PO boxes listed and outreach to members whom the majority have a permanent address. We recommend continuing to outreach and work with those that need a PO box separately. Could CMS consider adding another check box for an individual to indicate if they are experiencing homelessness or do not have stable housing – a question that justifies a PO box and allows targeted outreach to those that need the assistance.

We would also appreciate CMS providing a definition of homelessness. We have come across situations where applicants have sold a home or are building a home and have a gap in a permanent address.