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March 14, 2022

William N. Parham, III
Director, Paperwork Reduction Staff
Office of Strategic Operations and Regulatory Affairs
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244

Submitted electronically via regulations.gov

RE: Agency Information Collection Activities; Proposed Collection; Comment Request; Model Medicare Advantage and Prescription Drug Plan Individual Enrollment Request

Dear Mr. Parham:

This letter is in response to the “Agency Information Collection Activities; Proposed Collection; Comment Request; Model Medicare Advantage and Prescription Drug Plan Individual Enrollment Request” notice published in the January 12, 2022 *Federal Register*.

Humana Inc., headquartered in Louisville, Kentucky, is a leading health care company that offers a wide range of insurance products and health and wellness services that incorporate an integrated approach to lifelong well-being. Humana currently serves approximately 5 million beneficiaries enrolled in our MA plans and 3.6 million beneficiaries enrolled in our Medicare Part D Prescription Drug Plans (PDPs). As one of the nation’s top contractors for Medicare Advantage (MA), we are distinguished by our nearly 30-year, long-standing, comprehensive commitment to Medicare beneficiaries across the United States. These beneficiaries – a large proportion of whom depend upon the Medicare Advantage program as their safety net and many in underserved areas – receive integrated, coordinated, quality, and affordable care through our plans.

Model Individual Enrollment Request Form – Section 2

CMS proposes to modify the Medicare Advantage and Part D individual enrollment form to include questions on the race and ethnicity of the prospective enrollee. While these questions will be optional for enrollees, CMS will require plans to include the questions on the enrollment form.

Humana Comments: Humana supports CMS’s goal of collecting race and ethnicity data from Medicare beneficiaries in order for the agency to better understand the diversity of the beneficiary population, as well as the broader health equity efforts to identify patterns of differences across key process and care outcomes by sociodemographic characteristics. In order

for Humana and other Medicare Advantage and Part D sponsors to comply with the proposed changes to the Model Individual Enrollment Request Form and submit the collected race and ethnicity data to CMS, updates will need be required in order to add a new field to plan transmission files, as the current record layout for enrollment transmissions does not include fields related to the proposed new race and ethnicity questions. By our estimate, this IT work will take at least six months and possibly longer. CMS would also need to provide an updated record layout and a technical changes memo to advise plans of the new submission requirements, should these changes to the model be adopted. Additionally, Humana requests that CMS provide plans with a timeline for these expected changes.

We value this opportunity to provide comments and are pleased to answer any questions you may have with respect to the comments below. We hope that you consider our comments as constructive feedback aimed at ensuring that together we continue to advance our shared goals of improving the delivery of coverage and services in a sustainable, affordable manner to Medicare beneficiaries, focused on improving their total health care experience.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Hoak", written in a cursive style.

Michael Hoak
Vice President, Public Policy