

# PUBLIC SUBMISSION

<b>As of:</b> 10/26/22, 9:19 AM
<b>Received:</b> October 21, 2022
<b>Status:</b> Draft
<b>Tracking No.</b> l9i-r7yv-aij2
<b>Comments Due:</b> November 08, 2022
<b>Submission Type:</b> API

**Docket:** CMS-2022-0132

Medicare Part C and Medicare Part D Enrollment Form Interviews (CMS-10816)

**Comment On:** CMS-2022-0132-0002

Agency Information Collection Activities; Proposals, Submissions, and Approvals

**Document:** CMS-2022-0132-DRAFT-0002

Comment on CMS-2022-0132-0002

---

## Submitter Information

**Email:** alicia.santore@atriohp.com

**Organization:** ATRIO Health Plans

---

## General Comment

Responding to the Request for Comment for Document Identified: CMS-10816, Medicare Part C and Part D Enrollment Form Interviews, we have a few comments to provide regarding potential drivers of nonresponse to the race and ethnicity questions.

1. Beneficiaries may not be responding to the race/ethnicity questions because they might feel like it's an invasion of their privacy.
2. Some individuals may not understand why race/ethnicity questions are being asked.
3. Beneficiaries may also feel like it could be used against them (discrimination).
4. Beneficiaries could have concerns about bias (in pricing, services) could be a reason for non-response. Given how blended society has become, having accurate and appropriate categories may prove challenging (for example, what do people who are mixed race select?).
5. To help facilitate responses, perhaps agents/brokers could obtain this information at the conclusion of a sales activity (to assure that whatever plan was selected was not influenced by the question).
6. Another potential process to collect this information would be a voluntary mail card where the individual can remain anonymous, if the data is only to be used for statistics.