

June 24, 2024

William N. Parham, III
Director, Division of Information Collections and Regulatory Impacts
The Centers for Medicare & Medicaid Services ("CMS")
Office of Strategic Operations and Regulatory Affairs
Attention: Document Identifier: CMS-10887
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Submission via Reginfo.gov

Re: Medicare Part D Reporting Requirements and Supporting Regulations in MMA Title I,
Part 423, §423.514(a) (CMS-10185) - IRA

Dear Mr. Parham:

Devoted Health, Inc. ("Devoted") appreciates the opportunity to offer comments on the Medicare Part D Reporting Requirements pertaining to the Medicare Prescription Payment Plan ("M3P"). We commend CMS on its efforts to find innovative solutions to ensure that seniors of all economic means have access to quality prescription drug care while recognizing that the costs of prescription drugs continue to increase, and we applaud CMS for its focus on promoting equitable, high-quality, and person-centered care to Medicare beneficiaries. We share these goals and hope to partner with CMS to achieve them. Along these lines, we offer the following comments for purposes of clarity regarding the M3P program.

About Devoted

Devoted Health, Inc. (Devoted) is an all-in-one health care company, founded in 2017, that began first offering MA plans in 2019. Devoted operates with a mission of caring for our members like family. As of January 1, 2024, we serve more than 201,000 beneficiaries across thirteen (13) states: Alabama, Arizona, Colorado, Florida, Hawaii, Illinois, North Carolina, Ohio, Oregon, Pennsylvania, South Carolina, Tennessee, and Texas. In our quest to be a nationally scalable five-star MA plan, we built our plan from the ground up, seeking to develop solutions and deliver care in a way that best meets our members' needs. We offer extensive and competitive benefits, a network of exceptional providers, and concierge-level, highly personalized customer service, powered by our proprietary technology platform. Integrated, transparent and actionable data is at the heart of our model, and our technology platforms provide a personalized, real-time 360-degree view of each member and empowers us to deliver world-class service and care in close coordination with our provider partners.

At the core of our success in serving members are partnerships with physicians. Value-based care is core to Devoted's DNA: we seek out the highest-quality primary care physicians ("PCP")

in our service areas and work with them to deliver high quality care to our enrollees. This is in addition to our own tech-enabled medical group, Devoted Medical Group ("Devoted Medical"), which complements our provider partners and works in collaboration to deliver care to members at home via telehealth services and in-home visits.

Devoted Medical is a physician-led, largely virtual, and home-based medical practice that provides high-touch, high-fidelity, advanced clinical care to its patients. Everything Devoted Medical does is "additive" to the PCP model, recognizing that PCPs are being asked to do more with less. Devoted Medical provides intensive episodic care from urgent care to transitions of care, multidisciplinary longitudinal care for those with the most needs, highly impactful specialty care for chronic diseases, and comprehensive care focused on prevention, chronic disease management, adherence, and the social determinants of health.

M3P Program Clarification Questions

We believe clarification concerning the proposed Part D reporting requirements (Section VII - Medicare Prescription Payment Plan, Unsettled Balances - sub-bullets L, M, N, and O) would be useful to all as we prepare to implement M3P. Specifically, we seek additional detail regarding the definition of "Unsettled Balances" as it pertains to the required Part D reporting elements and what should be included in the Part D sponsor's identification of "Unsettled Balances".

Specific examples that could be included in an expanded definition of "Unsettled Balances" include:

- a. balances waived as a result of Part D sponsor's receipt of bankruptcy paperwork from a member
- b. balances for members who are reported as deceased by CMS

Thank you for the opportunity to submit comments and your consideration of our letter.

Sincerely,

Kathryn Lepseovich
Vice President, Membership Operations
Devoted Health, Inc.