



January 21, 2025

Centers for Medicare & Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Attention: Document Identifier: CMS-10796
Room C4-26-05
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Submitted Electronically: www.regulations.gov

Re: Dual Eligible Special Needs Plan Contract with the State Medicaid Agency

Dear Sir/Madam:

UnitedHealthcare (UHC) is responding to the proposed information collection request entitled, Dual Eligible Special Needs Plan Contract with the State Medicaid Agency, published by the Centers for Medicare & Medicaid Services (CMS) in the Federal Register on November 22, 2024 (89 FR 92690).

UnitedHealthcare offers a full range of health benefits, enabling affordable coverage, simplifying the health care experience and delivering access to high-quality care. UnitedHealthcare is the health benefits business of UnitedHealth Group, a health care and well-being company working to help build a modern, high-performing health system through improved access, affordability, outcomes and experiences. We are committed to a future where every person has access to high-quality, affordable health care and a modern, high-performing health system that reduces disparities, improves outcomes, and lessens the burden of disease.

UHC would like to raise some questions regarding this proposed information collection request so we can better understand the potential impact and burden.

1. The Medicaid managed care contract upload requirement would appear to be unnecessary because it's UHC's understanding that CMS already possesses the executed Medicaid managed care contracts.
2. Will CMS require Medicare Advantage organizations to complete and upload a separate Medicaid contract matrix similar to the State Medicaid Agency Contract (SMAC) matrix? If so,

UHC requests that CMS share the proposed Medicaid contract matrix fields and allow Medicare Advantage organizations to comment on those proposed fields.

3. What will CMS expect from a Medicare Advantage organization that does not have a complete Medicaid contract due to circumstances outside its control?

Thank you for your consideration of our questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer Martin', with a horizontal line extending from the end.

Jennifer Martin
Director, Regulatory Affairs
jennifer_j_martin@uhc.com
763-283-4469