



May 20, 2025

Centers for Medicare & Medicaid Services
Division of Regulations Development
Attention: Document Identifier/OMB Control Number (0938-1422)
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Submitted electronically using www.regulations.gov.

Re: Comment Opportunity: D-SNP Enrollee Advisory Committee (CMS-10799) | Federal Register notice (90 FR 13367)

Thank you for the opportunity to give feedback on the D-SNP Enrollee Advisory Committee.

UCare is an independent, non-profit health plan with a staff committed to serving our enrollees, our communities, our business partners, and our employees from a foundation built on the values of integrity, community, quality, flexibility, and respect.

Comments:

- UCare is concerned about the CMS requirement to incorporate CMS required social determinates of health (SDOH) questions into our health risk assessment (HRA). In Minnesota, health plans are required to administer a standardized, state-developed HRA, and are unable to incorporate additional CMS-required social determinants of health (SDOH) questions into that tool without state approval.

Absent an exception for states with mandated HRAs, plans would be required to administer an additional, supplemental assessment solely to meet the proposed CMS SDOH requirements. This would create added administrative burden for plans and potentially cause confusion or survey fatigue among enrollees.

If CMS proceeds with requiring specific SDOH questions, UCare recommends that CMS consider either:

- Mandating that state-developed HRAs incorporate the CMS-required SDOH questions, or
- Align the required SDOH questions with the HEDIS-approved Social Need Screening and Intervention (SNS-E) measure.

Such alignment would allow plans to meet federal and state requirements using a single, standardized tool and avoid unnecessary duplication for both plans and enrollees.

Thank you for considering our suggestions. Please contact us if you have questions:

MedicareGRLeadershipTeam@ucare.org

Sincerely,

Medicare Team

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