



March 4, 2025

Centers for Medicare & Medicaid Services  
Office of Strategic Operations and Regulatory Affairs  
Division of Regulations Development  
Attention: OMB Control Number: 0938-1296  
Room C4-26-05  
7500 Security Boulevard  
Baltimore, MD 21244-1850

Submitted Electronically: [www.regulations.gov](http://www.regulations.gov)

**Re: Medicare Advantage Model of Care Submission Requirements**

Dear Sir/Madam:

UnitedHealthcare (UHC) is responding to the Information Collection Request (ICR) for the Medicare Advantage Model of Care Submission Requirements. The ICR was published by the Centers for Medicare & Medicaid Services (CMS) in the Federal Register on January 3, 2025.

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.

**Medicare Advantage Model of Care Submission Requirements**

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

1. Will CMS require Medicare Advantage organizations to complete MOC element 1.A for new D-SNP contracts for the upcoming plan year? If so, UHC requests that CMS share the proposed language that can be utilized as the Medicare Advantage organization will not have their State Medicaid Agency Contracts and corresponding Medicaid categories approved by CMS at the time of submission.
2. If CMS decides to finalize its proposal, UHC requests that CMS provide Medicare Advantage organizations with additional development time to implement these changes, particularly since Medicare Advantage organizations will need to incorporate the defined and requested data

requirements at least 6 months prior to submissions. UHC recommends a 2028 plan year effective date (or later), with an August 2026 collection date, instead of the potential 2027 plan year effective date and August 2025 collection date.

Thank you for your thoughtful consideration of our comments. Should you have any questions, please do not hesitate to contact me.

Sincerely,



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