June 30, 2025

Author Full Name: Adam Hunn Received Date: 06/30/2025 10:51 AM

Comments Received:

Lumeris and Essence Healthcare appreciates the opportunity to provide comment on this proposed data collection. In light of the Trump Administration's Executive Order 14192 "Unleashing Prosperity Through Deregulation," we highly encourage CMS to review this data collection in the context of existing Part C reporting requirements as many data elements are duplicative between this quarterly reporting and the required annual reporting (broken down by quarter). Given the data elements include contract and plan benefit package (PBP) we would ask that CMS allow organizations to upload at the parent level and for CMS to create system logic on their end to stratify by the requested levels to reduce plan burden in the upload process. Finally, the specifications state to exclude duplicate payment requests but does not provide clear guidance on how plans are expected to report duplicate appeal requests (which are excluded in Part C and D Reporting). We would ask that CMS provide clarification in finalized specifications on whether duplicate appeals should also be excluded if the collection is ultimately finalized.