



Barbara Reid
WI080-1000
2725 Mall Drive
Eau Claire, WI 54701

To: Elizabeth Goldstein
Centers for Medicare & Medicaid Services
Department of Health & Human Services

From: Barbara Reid
PSMG Regulatory Affairs
UnitedHealth Group

Date: June 16, 2010

Re: CMS–R–246 (OMB#: 0938–0732); *Consumer Assessment of Health Care
Providers and Systems (CAHPS)*

We have reviewed the *Consumer Assessment of Health Care Providers and Systems (CAHPS)* collection in response to the notice published in the April, 19, 2010 Federal Register (75 FR 20365) and provide the attached comments.

These comments are provided on behalf of Ovations and other UnitedHealth Group affiliates, including AmeriChoice, that manage Medicare Advantage and Part D business (collectively “United”).

We greatly appreciate the opportunity to comment, and we look forward to continuing to work with CMS to develop successful products and services for Medicare beneficiaries. If you have any questions or concerns on our comments, please contact me at 715-832-5235 or via email at barbara_reid@uhc.com.

Consumer Assessment of Health Care Providers and Systems (CAHPS)

**Comments Submitted by
UnitedHealth Group/Ovations
June 16, 2010**

1. **Question #39, MA Only Survey, Proposed Additions, Attachment A, Proposed Modifications to CAHPS Survey, p 9**

Issue: Currently, question 30 is listed under the "Getting Health Care From Specialists" header. If this is intended to measure plan coordination of care, it should be under the "Health Plan" header. Further, if the intent is to measure coordination of care from plans rather than specialists, then the question is unclear regarding from whom the help was to have been received. For example, beneficiaries may think of help they may or may not have received from their doctor, rather than the health plan.

Recommendation: If the intent of adding the question is to assist in understanding and improving how care is being coordinated within Medicare plans, rather than amongst specialists, we recommend moving the question under the "Health Plan" header and revising the question to direct the beneficiaries' attention to the health plan. For example: "How satisfied are you with the help you received from your current health plan to coordinate your care in the last 6 months?"

2. **Question # 41, MA Only Survey and MAPD Survey/Proposed Additions, Attachment A, Proposed Modifications to CAHPS Survey, pp 10, 12**

Issue: The lead in sentence prior to the question - "An insurance agent or broker sells insurance for your health, your home, or your car"- is somewhat misleading. The inclusion of "home" and "car" in the sentence distracts the beneficiary from focusing on the interaction with their current health plan.

In addition, since the results of the CAHPS survey will be attributed to the plan administering the survey to its current members, we believe the intent is to survey the sales activity of the current health plan issuing the CAHPS survey, not the sales activity of *any* agent or broker selling any healthcare related insurance. Even though the question is under the "Your Health Plan" header, the question is not specific enough for beneficiaries. For example, a beneficiary may answer "yes" if a broker/agent representing some other plan approached them unsolicited.

Recommendation: We recommend eliminating the lead in sentence and specifying that the question applies to the current plan in which the beneficiary is enrolled. For example, revising the question as follows: "Did an insurance agent

or broker from your current health plan ever call you without your asking them to, to tell you about insurance for health care or prescription medicines?"

3. **Question # 42, MA Only Survey and MAPD Survey/Proposed Additions,**
Attachment A, Proposed Modifications to CAHPS Survey, pp 10, 12

Issue: Question # 42 states: Did an insurance agent or broker ever visit your home you (sic) without your asking them to, to tell you about insurance for health care or prescription medicines?

Since the results of the CAHPS survey will be attributed to the plan administering the survey to its current members, we believe the intent is to survey the sales activity of the current health plan issuing the CAHPS survey, not the sales activity of *any* agent or broker selling any healthcare related insurance. Even though the question is under the "Your Health Plan" header, the question is not specific enough for beneficiaries. For example, a beneficiary may answer "yes" if a broker/agent representing some other plan approached them unsolicited.

Recommendation: We recommend specifying that the question applies to the current plan in which the beneficiary is enrolled. For example, "Did an insurance agent or broker from your current health plan ever visit your home without your asking them to, to tell you about insurance for health care or prescription medicines?"

4. **Question # 43, MA Only Survey and MAPD Survey/Proposed Additions,**
Attachment A, Proposed Modifications to CAHPS Survey, pp 10, 12

Issue: As in question # 42, we believe the intent of question # 43 is to survey the activities of the current health plan within the past 12 months, not *any* health plan with which the member may have ever contracted. Even though the question is under the "Your Health Plan" header, the question is not specific enough for beneficiaries. For example, a beneficiary may answer "yes" if *any* plan ever switched them to a different plan without their permission.

Recommendation: We recommend specifying that the question applies to the current plan in which the beneficiary is enrolled. For example: "Did an insurance agent or broker from your current health plan ever switch you to a different health care plan without your permission?"

5. **PPO Questions, MAPD Survey/Proposed Additions,** *Attachment A, Proposed Modifications to CAHPS Survey, p 11*

Issue: For the PPO questions, a, b and c, the explanation of a PPO is at the end of the question and is marked as d. However, it is not a question, but an explanation of the PPO. This formatting may prove confusing to beneficiaries.

Recommendation: We recommend revising the PPO explanation for clarity, eliminating the marking “d.,” and placing the explanation before the questions a, b, and c. For example:

“Some insurance plans, such as a PPO, have a network or group of doctors who belong to the plan. You pay less if you use doctors who belong to the network, and more if you use doctors who are not part of the network.

- a. Does...
- b. In the last 6 months....
- c. Was the information...”

6. **Question # 3, Medicare Stand Alone PDP Survey/Proposed Additions,**
Attachment A, Proposed Modifications to CAHPS Survey, p 13

Issue: There is a grammatical error in question #3, "describes" is plural and should be singular.

Recommendation: We recommend revising the question as follows: “Each fall Medicare Prescription Drug Plans send out notices that describe any changes in their plan...”