



May 24, 2016

Centers for Medicare & Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Attention: CMS-10316 (OMB No. 0938-1113)
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: CMS-10316 (OMB No. 0938-1113)

Dear Sir or Madam:

We are writing on behalf of America's Health Insurance Plans (AHIP) in response to the notice under the Paperwork Reduction Act (PRA) concerning the "Implementation of the Medicare Prescription Drug Plan (PDP) and Medicare Advantage (MA) Plan Disenrollment Reasons Survey" published by the Centers for Medicare & Medicaid Services (CMS) in the Federal Register (81 FR 16184) on March 25, 2016. The survey is of interest to AHIP's member organizations, many of which participate in the MA and Medicare Part D Prescription Drug Benefit (Part D) programs. Our comments appear below.

GENERAL COMMENT

CMS is proposing to remove a number of survey questions, which would reduce the total number of questions in the disenrollment reasons survey. The total number of questions in the English-version of the proposed survey is as follows: 63 (MA-PD survey), 54 (PDP survey), and 45 (MA-Only survey). We appreciate CMS' proposal to shorten the length of the current survey. However, we believe that beneficiaries who have voluntarily disenrolled from a plan may still find the survey too long or time consuming and therefore choose not to respond. We recommend that CMS consider further reducing the number of questions in the survey to encourage beneficiary participation.

SPECIFIC COMMENTS

Getting Information or Help from Your Former Health Plan/ Getting Health Care and the Prescription Medicines You Needed from Your Former Health Plan. (MA-PD survey, pages 29-31). These sections of the proposed survey include sets of questions on a particular topic. If beneficiaries select the response "Yes," they are directed to the next question in the set. If beneficiaries select the response "No," they are instructed to skip the next question and move to the following set of questions. We have a concern with the fifth response option under Question #4 and how it interacts with Question #3. Under Question #3, beneficiaries are directed to Question #4 only

if they respond that they did try to get information or help from their former plan's customer service. However, the fifth response option under Question #4 indicates that the beneficiary did not try to get information or help from his/her former plan's customer service, which seems inappropriate given the instructions under Question#3 to skip Question #4 in this case. We are concerned that this response option creates the potential for inconsistent answers. This problem also exists under Questions #6, 8, 14 and 16. We believe that CMS should either combine the questions within these sets or eliminate the fifth response option under the applicable questions. This comment also applies to comparable sections and questions under the PDP survey (pages 42-43) and the MA-Only survey (page 53).

Your Experience with Insurance Agents, Brokers, or Plan Representatives. (Section removed from MA-PD, PDP and MA-Only surveys). CMS is proposing to remove the set of questions related to beneficiary experience with insurance agents, brokers, or plan representatives from the survey instrument. As indicated in our previous comments regarding this section of the survey, we believe such questions cannot be directly linked to a beneficiary's decision to voluntarily disenroll and should therefore not be included in the survey. AHIP agrees with CMS' proposal to remove these questions. Further, we believe that removing these questions is an important aspect of the agency's efforts to shorten the length of the survey.

We appreciate the opportunity to provide comments on the disenrollment reasons survey. Please contact me if additional information would be helpful or if you have questions about the issues raised in this letter. I can be reached at (202) 778-3256 or mhamelburg@ahip.org.

Sincerely,



Mark Hamelburg
Senior Vice President, Federal Programs