



Shannon Schuster
Director, Regulatory Affairs
Government Programs
UnitedHealthcare
3100 AMS Blvd
Green Bay, WI 54313
920-661-6217

To: Centers for Medicare and Medicaid Services
Submitted electronically via: www.regulations.gov

From: Shannon Schuster
UnitedHealthcare
UnitedHealth Group

Date: June 24, 2019

Re: *Part C Medicare Advantage Reporting Requirements and Supporting Regulations in 42 CFR 422.516(a)*

Attached are comments regarding the Part C Medicare Advantage Reporting Requirements and Supporting Regulations in 42 CFR 422.516(a) (CMS-10261).

Part C Medicare Advantage Reporting Requirements and Supporting Regulations in 42 CFR 422.516(a)

**Comments Submitted by
UnitedHealthcare
6/24/19**

UnitedHealthcare (United) appreciates the opportunity to provide input to CMS regarding the newly proposed Telehealth reporting requirements in the Part C Medicare Advantage Reporting Requirements and Supporting Regulations in 42 CFR 422.516(a).

According to the Supporting Statement, the changes for the 2020 Reporting Requirements will require plans to report Telehealth benefits. "The data collected in this measure will provide CMS with a better understanding of the number of organizations utilizing Telehealth per contract and to also capture those specialties used for both in-person and Telehealth. This data will allow CMS to improve its policy and process surrounding Telehealth."

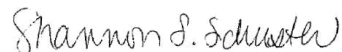
CMS adds, "In addition, Section 1852(m) of the Social Security Act (the Act) and CMS regulations at 42 CFR § 422.135 allow Medicare Advantage (MA) plans the ability to provide 'additional telehealth benefits' to enrollees starting in plan year 2020 and treat them as basic benefits."

With regard to the Telehealth reporting requirements that CMS is seeking data on, it is unclear as to whether CMS is requesting data on the Original Medicare covered Telehealth benefit or the Additional Telehealth benefit. We believe that CMS is requesting data specifically on the new Additional Telehealth benefit. Therefore, we request that CMS clarify this by naming the topic, "Additional Telehealth" and restating the data elements so it is clear that they relate to the Additional Telehealth benefit, which organizations may begin offering in CY 2020.

For data element "D", CMS asks for the "Total number of contracted Telehealth Providers per contract". Please note that organizations may contract with a single provider group that has multiple providers, a subset of whom respond to member Additional Telehealth requests. We ask that CMS clarify how they want organizations to respond to element D and whether it is acceptable for organizations to provide the response at the provider group level.

If you have any questions on these comments, please feel free to contact me at 920-661-6217.

Respectfully,



Shannon Schuster
Director, Regulatory Affairs
UnitedHealthcare