



January 27, 2025

Centers for Medicare and Medicaid Services (CMS)
Department of Health and Human Services
Attention: CMS-4208-P
P.O. Box 8013
Baltimore, MD 21244-1813

RE: CMS-4208-P – Medicare and Medicaid Programs; Contract Year 2026 Policy and Technical Changes to the Medicare Advantage Program, Medicare Prescription Drug Benefit Program, Medicare Cost Plan Program, and Programs of All-Inclusive Care for the Elderly; published at Vol. 89, No. 237 Federal Register 99340-99579 on December 10, 2024.

Submitted electronically via <http://www.regulations.gov>

Dear CMS Administrator,

UnityPoint Health appreciates this opportunity to provide comments on Contract Year CY 2026 Medicare Advantage (MA) Program Proposed Rule. UnityPoint Health is one of the nation's most integrated health care systems. Through more than 29,000 employees and our relationships with more than 390 physician clinics, 36 hospitals in urban and rural communities, 12 home care areas of service, and 5 affiliated community mental health centers throughout our 8 markets, UnityPoint Health provides care throughout Iowa, central Illinois, and southern Wisconsin. On an annual basis, UnityPoint Health hospitals, clinics, and home health agencies provide a full range of coordinated care to patients and families through more than 8 million patient visits.

UnityPoint Health appreciates the time and effort of CMS in developing this proposed rule. We respectfully offer the following input on behalf of our affiliated ACO and PACE Organization.

ACCOUNTABLE CARE ORGANIZATIONS (ACOs)

UnityPoint Health is committed to payment reform and is actively engaged in numerous initiatives that support population health and value-based care. UnityPoint Accountable Care is the ACO affiliated with UnityPoint Health and has value-based contracts with multiple payers, including Medicare. UnityPoint Accountable Care currently participates in the CMS Medicare Shared Savings Program (MSSP), and it contains providers that have participated in the Center for Medicare and Medicaid Innovation (CMMI) Global and Professional Direct Contracting Model, Next Generation ACO Model, and the Pioneer ACO Model.

UnityPoint Accountable Care is a member of the National Association of ACOs (NAACOS), and we

support the input in their formal comment letter. Additionally, we encourage CMS to consider addressing the issue outlined below.

D08 - Medication Adherence for Diabetes Medications: Medicare 2025 Part D Star Ratings, Domain 4, includes measure D08 - Medication Adherence for Diabetes Medications. This measure is intended to monitor the percent of plan members with a prescription for diabetes medication who fill their prescription often enough to cover 80% or more of the time they are supposed to be taking the medication.

Comment: We support the inclusion of a medication adherence measure for diabetes medications and agree with the *Medicare 2025 Part C & D Star Ratings Technical Notes* that “one of the most important ways people with diabetes can manage their health is by taking their medication as directed.” It is important that this measure is accurate. With the proposed coverage of GLP-1s for obesity, we believe the D08 denominator has been inadvertently expanded. **We respectfully urge CMS to re-evaluate this measure and limit the denominator to include only those individuals taking the medications for diabetes as their primary diagnosis.**

PROGRAM FOR ALL-INCLUSIVE CARE FOR THE ELDERLY (PACE)

UnityPoint Health is pleased to offer PACE services within the State of Iowa. Presently we have two PACE Centers in Sioux City and Bettendorf, and we have two pending PACE applications with CMS to provide PACE services at Centers to be located in Hiawatha and Waterloo. **UnityPoint Health is a member of the National PACE Association, and we support the input in their formal comment letter.** Additionally, we encourage CMS to re-evaluate its enrollment process as outlined below.

Effective Date of Enrollment (§460.158): CMS has NOT proposed any revision to this regulation, which provides that enrollment is effective the first day of the calendar month following the date of the executed enrollment agreement.

Comment: UnityPoint Health urges CMS to revise this provision to enable PACE enrollment to become effective on the date of the signed agreement. This rule causes delays in obtaining services and PACE Participant and family dissatisfaction. In some cases, this wait period forces Participants into nursing facilities. As an alternative to nursing facility care, we firmly believe that the PACE enrollment process should be just as easy as getting admitted into a nursing facility. We encourage CMS to adopt a presumptive eligibility process to permit immediate enrollment of eligible PACE Participants.

We are pleased to provide input on this proposed rule and its impact on our health system, our beneficiaries, and communities served. To discuss our comments or for additional information on any of the addressed topics, please contact Cathy Simmons, Executive Director, Government & External Affairs at cathy.simmons@unitypoint.org or 319-361-2336.

Sincerely,


Cathy Simmons, MPP, JD
Executive Director, Government & External Affairs
UnityPoint Health