



Jennifer McKenna
Director, Medicare Regulatory Affairs
9800 Healthcare Lane
Minnetonka, MN 55343
952-931-5681

To: Centers for Medicare and Medicaid Services
Submitted electronically via: <http://www.regulations.gov>

From: Jennifer McKenna
UnitedHealthcare
UnitedHealth Group

Date: December, 21 2020

Re: CY 2022 Plan Benefit Package Software and Formulary Submission [CMS-R-262]

Attached for your consideration are UnitedHealthcare's comments regarding CY 2022 Plan Benefit Package Software and Formulary Submission put forth for comment on October 21, 2020.

CY 2022 Plan Benefit Package Software and Formulary Submission [CMS-R-262]

UnitedHealthcare (UHC) appreciates this opportunity to provide input to the Centers for Medicare and Medicaid Services (CMS) regarding the CY 2022 Plan Benefit Package Software and Formulary Submission. Below please find the Plan Benefit Package Software comments that we submitted on February 13, 2020 in response to the CY 2021 Plan Benefit Package Software and Formulary Submission 30-day comment opportunity. These comments, also submitted to CMS on December 3, 2019, were ones that CMS had responded would be considered for future development. As these items are reviewed within CMS, we would appreciate the opportunity to partner with CMS on any development or testing efforts. We have no additional comments at this time.

Plan Benefit Package (PBP) Software

Section C

Number of Out-of-Network Groups

The current limit on the number of out-of-network groups in Section C has negatively impacted UHC's ability to enter intended benefits in the cost sharing fields. When we reach the limit, we must file benefits in out-of-network groups that do not align with their intended cost share. We then add a note to explain which cost share is applicable to each benefit. UHC requests that CMS increase the limit of out-of-network groups in the PBP software or align to in-network data entry. This would allow out-of-network plan benefits to be more accurately captured in the filing, reduce the number of filed notes, and provide better data for members in Medicare Plan Finder and the Medicare & You Handbook.

General

Year-Over-Year Tracking

In order to help organizations track Year-Over-Year (YOY) benefit changes during PBP entry, it would be helpful if CMS were to implement functionality in the PBP software such that when an organization changes a benefit in the PBP, that PBP field changes to a different color so as to clearly delineate the change. We recommend that CMS introduce this PBP software functionality.

Planning, Creation and Testing

UHC would like to be involved in any potential changes to bid submission and offers our assistance in designing, implementing and testing any new functionality. We use the current CMS process and tools for our internal readiness every year. Thus, potential changes in the PBP software or overall bid submission process would impact our planning. The ability to understand and implement any changes timely will be critical to serving our members and meeting CMS'

timelines for 2021 bid submission.

UHC respectfully requests to collaborate with CMS in its planning, creation and testing of any new PBP software and bid submission functionality. UHC will be able to provide valuable insight as to impacts of CMS' PBP and bid functionality changes to MA Plans and Part D Sponsors. We would like to offer an extensive partnership with CMS to help make this potential change easier for industry stakeholders.

If you have any questions on these comments, please feel free to contact me at 952-931-5681.

Respectfully,

Jennifer McKenna

Jennifer McKenna
Director, Medicare Regulatory Affairs
UnitedHealthcare