

HealthPartners, Inc. Comments on CMS 10137, OMB 0938-0936:
Applications for Medicare Prescription Drug Plan 2022
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Thank you for the opportunity to submit comments on Applications for Medicare Prescription Drug Plan 2022. The following comments are regarding the experience uploading Pharmacy list files in the new My Application module, including the Supporting Statement – Part A. We thank CMS in advance for consideration of our comments.

Supporting Statement A

- In the Supporting Document, CMS noted that the only changes to the 2022 Application were technical changes related to dates and clarification of instructions. In relation with these changes and based on lessons learned using the new My Application module in HPMS for 2022 applications, we are requesting CMS publish the technical specifications for each type of the pharmacy lists. For 2022, we ran into issues with populating zip codes on the Long Term Care pharmacy list and Home Infusion pharmacy list, but did not have issues when we populated the zip codes exactly the same on the Retail Pharmacy list. The warning messages for these errors in HPMS were also non-helpful, which prompted us to contact the help desk for further research with their developers. Similarly, on the Part C side for HSD tables, the Network Adequacy Guidance provides column explanations for their provider and facility templates to clarify character limitations, formatting instructions, and other details needed to accurately populate the columns.

Recommendation: CMS publish the technical specifications for the pharmacy lists in the Part D application guidance. This would streamline the submission process, provide transparency, and reduce burden on plans and CMS by providing plans the information necessary to troubleshoot the issues without needing to seek assistance from the help desk.