

PUBLIC SUBMISSION

As of: 2/23/22 7:07 PM
Received: February 22, 2022
Status: Draft
Category: Health Plan or Association
Tracking No. kzy-lxwb-llzk
Comments Due: February 22, 2022
Submission Type: Web

Docket: CMS-2021-0194
Medicare Prescription Drug Benefit Program (CMS-10141)

Comment On: CMS-2021-0194-0001
Medicare Prescription Drug Benefit Program (CMS-10141)

Document: CMS-2021-0194-DRAFT-0008
Comment on CMS-2021-0194-0001

Submitter Information

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General Comment

CVS Health appreciates the opportunity to comment on the notice with comment period issued by CMS entitled: “Agency Information Collection Activities: Proposed Collection; Comment Request” as published in the Federal Register on December 21, 2021. CMS has indicated that based on industry feedback, they are proposing to redesign the 2023 Part D Explanation of Benefits (EOB) model to improve readability and content clarity for enhanced beneficiary understanding and utilization. We appreciate the opportunity to provide comments on this important beneficiary-facing, transparency tool.

CVS Health serves millions of people through our local presence, digital channels, and our nearly 300,000 dedicated colleagues – including more than 40,000 physicians, pharmacists, nurses, and nurse practitioners. Our unique health care model gives us an unparalleled perspective on how systems can be better designed to help consumers navigate the health care system – and their personal health care – by improving access, lowering costs, and being a trusted partner for every meaningful moment of health. And we do it all with heart, each and every day.

CVS Health produces Part D EOBs on behalf of Medicare Part D Plans, and mails approximately 12 million EOBs every month (144 million annually). We appreciate CMS’ effort in taking industry and beneficiary feedback into account in their proposed, redesigned 2023 Part D EOB model. We share CMS’s goal of ultimately, creating an improved and less confusing EOB experience for all beneficiaries.

For an enhanced beneficiary-friendly experience, we recommend CMS consider:

1. Removing Requirement for Beneficiaries to Opt-In to Electronic Delivery of the EOB
2. Allowing Plans Flexibility in Part D EOB Model Formatting Similar to that Offered for Part C EOBs

A more detailed discussion of our recommendations is provided in the attached appendix, including a mock-up Part D EOB that presents our recommended changes.

Thank you for considering our recommendations and comments. We welcome the opportunity to further engage with CMS on the redesign of the 2023 Part D EOB model to better aid in beneficiaries’ understanding of their Medicare drug prescription use and cost and make for an improved and less confusing EOB experience for all beneficiaries.

We would be happy to partner with CMS to further discuss our proposals regarding the 2023 Part D EOB or respond to any follow-up questions you may have.

Sincerely,

Melissa Schulman

Senior Vice President, Government & Public Affairs
CVS Health

Attachments

Attachment 2__2023_CVS_EOB_2.18.22 v7

Attachment 1__CVSH 2023 Part D EOB Comments FINAL 2.22.22