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General Comment

Healthfirst recommends CMS consider the following to improve member EOB experience:

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

EOB electronic delivery allows secure and immediate access to benefit information for members from anywhere there is an internet connection. Not only does this help members, this helps caregivers review important benefits information remotely. Additionally, electronic delivery allows members to access previous EOB and encourages members to interact more regularly with their Plan's member portals, which may lead to improved health literacy. Such communication method without prior authorization has been permitted since 2019 for other member documents, such as the Evidence of Coverage, Provider/Pharmacy Directory, and Formularies. Streamlining of communications reduces administrative burden for Plans which allows for further investment into member benefits.

Regarding formatting flexibility, in the CMS Memo dated January 31, 2014 and titled "Updates Regarding Final Part C EOB Model Templates and Implementation of the Part C EOB," CMS states that, "MAOs that wish to use [Part C] EOBs that are different from the CMS developed [Part C] EOB templates may do so, as long as the [Part C] EOB includes all of the information presented in the attached templates." Granting this flexibility would allow plans to create more member friendly Part D EOBs, so long as plans adhere to the required information, guidelines and specifications set forth in the Part D EOB model. Healthfirst recommends that CMS should adopt similar Part D EOB guidelines as contained in the sub-regulatory formatting flexibilities and specifications of the Part C EOB.