

Medicare Prescription Drug Benefit Program

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Thank you for the opportunity to submit comments on the Part D Explanation of Benefits (EOB) model documents. We appreciate CMS' approach to providing enrollees with a simpler, more straightforward display of information any time the drug benefit is utilized. However, the Part D benefit and the EOB are complex. The proposed changes to the model documents do not reduce the complexity, add significant value, or necessarily make it a more beneficiary friendly document. Beneficiaries are used to the current structure of the document, including the content.

In addition, a minimum of six months lead time is needed to implement changes to the EOB and we are concerned that the final EOB model document will not be released in time to meet a Jan. 2023 implementation due date. While the revisions do not appear burdensome to CMS, a local plan of our size needs this runway to make changes to and test our systems. Reformatting the EOB model will present unnecessary burden on plans as it will require more time to develop, program, and implement than what is noted in the Supporting Statement.

Recommendation: CMS keep the model EOB documents as is. Alternatively, if CMS moves forward with the changes to the EOB, we strongly propose that CMS delay the implementation due date until Jan. 2024, allowing plans to switch to the new format sooner.