



February 22, 2022

Centers for Medicare & Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Attention: OMB Control Number: 0938-0964
Room C4-26-05
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Re: Medicare Prescription Drug Benefit Program

Submitted Electronically: <https://www.regulations.gov/>

Dear Sir/Madam:

UnitedHealthcare (UHC) is submitting comments regarding the information collection request for the Medicare Prescription Drug Benefit Program. UHC is dedicated to helping people live healthier lives and making the health system work better for everyone by simplifying the health care experience, meeting consumer health and wellness needs, and sustaining trusted relationships with care providers. UHC offers the full spectrum of health benefit programs for individuals, employers, and Medicare and Medicaid beneficiaries, and contracts directly with more than 1.3 million physicians and care professionals, and 6,500 hospitals and other care facilities nationwide.

Based on our consumer research, members often do not read or understand how to read their Medicare EOBs due to the length and complexity of these materials. Further, members tend to be concerned with updates to their monthly totals (e.g., Out of Pocket Costs/ TrOOP, deductibles, etc.) and not the complex claims details/adjustments and medical terminology that members may not fully comprehend. This confusion unnecessarily leads to calls and complaints to customer service and CMS.

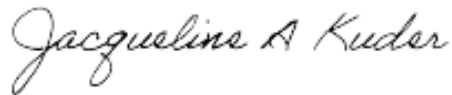
Another area of consistent complaint and concern from members is the amount of mail they receive, and the amount of paper being used. Medicare EOBs are now the largest single paper consuming communication sent to UHC members. On average, 385,650,000 pages of Medicare EOBs are mailed by UHC in a year, representing approximately 46,170 trees. In addition to other waste products, the paper used represents 34,700,000 pounds of CO2 equivalent, 41,200,000 gallons of water used, and 49,200M BTUs (*Environmental impact estimates were calculated using the Environmental Paper Network Paper Calculator Version 4.0. For more information visit www.papercalculator.org*).

With respect to Medicare EOB fulfillment requirements, UHC recommends that CMS permit MA plans and Part D sponsors to follow fulfillment requirements outlined in §§ 422.2267(d)(2)(i), 423.2267(d)(2)(i) rather than mailing paper copies. This would permit MA plans and Part D sponsors to provide the Medicare EOB consistent with other CMS-required materials such as the Evidence of Coverage (EOC), Formulary, and Directories to new and existing members via a paper notice informing members how to access these materials electronically or to contact customer service to request paper copies. We believe that mirroring this process for Medicare EOBs could help reduce member confusion and lower the high volume of plan materials that members often complain about receiving.

Alternatively, if the foregoing is unacceptable, UHC recommends that CMS permit MA plans and Part D sponsors to re-direct members to alternate sources to obtain certain Medicare EOB model content. For example, in place of printing CMS model content, a printed QR code that links to an accessible website could be used to obtain information surrounding fraud, appeal information, definitions, etc. Reducing the length and complexity of the information provided in the Medicare EOB would help reduce any negative environmental impact and member confusion, while still conveying important plan information.

UHC appreciates the opportunity to provide comments and looks forward to CMS's feedback.

Sincerely,

A handwritten signature in cursive script that reads "Jacqueline A Kuder".

Jacqueline Kuder
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