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Same as comments from 60 day comments below:

Regarding Part D EOB updates, this would be a very large effort to change. Although all of the data that we currently use to produce EOB letters is still within proposed letter, there is a lot of movement of information and formatting changes. For the work that I do each year in getting just minor updates changed takes an immense amount of time. If CMA made these changes, I would estimate a minimum of 40+ hours for the work that is needed from me, and this would not be over one week, it would have to be spread out over numerous weeks to work around other priorities.

I have also checked with our AOD and SLS partners as the bulk of the work would be put on them. Our one EOB letter version that gets approved each year equates to 21 versions in the system that is used to print letters. AOD has estimated about four months of work based on the one version that was provided here. The formatting variations causes the most trouble for setting up new letters.

If a new model were to be approved, and would be in effect for 2023, we would propose that new model templates are provided by CMS no later than July so we would have ample time to review and work through creating new letters while working through other projects as well.

Ideally, if CMS were to make a change, we would be able to have the option to continue using the current model provided or if we were to take on the new model, it would have a delayed effective date, like 2024 or later so there would be no concern with the timing of making changes.

Additionally,

The amount of effort to completely change the Part D EOB letter format is still very large. CMS changing the proposed effective date to 1/1/2024 will be very helpful though. If CMS is able to provide letter templates in a reasonable amount of time, we should be able to have updates in production on time. The original estimates I provided were about four months from the AOD/SLS perspective and a minimum of 40+ hours of time needed from me for review and testing with AOD/SLS. I suggested that CMS have templates ready for distribution by July for a January implementation date. This would still be my recommended latest time to have information to plan sponsors.

I also suggested that if CMS were to go forward with the change that they give plan sponsors a grace period where we could use either the current or new model. I would still suggest that, even with a delayed effective date of 1/1/2024, so there can be a backup plan if we run into issues.

As always, the sooner we know of the change, the better. If CMS is going to move forward with the new EOB letter template, I would hope they would provide an updated model will in advance of mid-2023.