

CMS Response to Public Comments Received for CMS-10142

The Centers for Medicare and Medicaid Services (CMS) received a comment from one plan sponsors related to CMS-10142. This is the reconciliation of the comment.

Comment:

One commenter opposed the movement of the repricing of MA supplemental benefits from upon request in Appendix B, item 38 for all plans regardless of gain/loss margin to being required with the initial June bid submission for bids with gain/loss margin greater than 11.5 percent in Appendix B, item 8.6.2. The plan sponsor sites specific concerns with difficult repricing scenarios, adequate staffing, proactively preparing responses to CMS inquiries during bid review, and understanding the triggers for bid review questions.

Response:

CMS appreciates the comment. For Contract Year (CY) 2023, CMS requested justification of benefit value in relation to the gain/loss margin, in the form of a benefit comparison and a premium comparison for MA bids with gain/loss margin greater than 11.5 percent per Appendix B, item 8.6. Appendix B, item 38, was upon request to further support changes in A/B mandatory supplemental benefits. CMS found that Appendix B, item 38, was needed in reviewing 80 percent of the MA bid pricing tools with gain/loss margin greater than 11.5 percent. Thus, for CY2024 rather than request this support during bid review, we are requesting it for bids with a gain/loss margin above 11.5 percent with the initial bid submission in Appendix B, item 8.6.2. Appendix B, item 38 will remain upon request for bids with gain/loss margin less than or equal to 11.5 percent. Attaining the support required in Appendix B 8.6.2 with the initial bid, should streamline the bid review process and allow plan sponsors to adequately prepare staffing and proactively prepare responses.

With regard to repricing questions, we direct the commenter to the User Group Call Questions and Answers from April 14, 2022 questions 7, 8, and 11 and from May 19, 2022 question 1.