



January 9, 2023

Centers for Medicare & Medicaid Services  
Office of Strategic Operations and Regulatory Affairs  
Division of Regulations Development  
OMB Control Number: 0938-0763  
Room C4-26-05  
7500 Security Boulevard, Baltimore,  
Maryland 21244-1850

Re: CMS Plan Benefit Package (PBP) and Formulary CY 2024

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

Dear Sir/Madam:

UnitedHealthcare (UHC) is responding to the Information Collection Request (ICR) for the Plan Benefit Package (PBP) and Formulary CY 2024. The ICR was published by the Centers for Medicare & Medicaid Services (CMS) in the Federal Register on November 9, 2022 (87 FR 67692). Below please find PBP-related comments we included in our January 3, 2022 letter to CMS regarding the information collection request for the Plan Benefit Package (PBP) and Formulary CY 2023.

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.

### **Export PBP Data Reports Directly to PDF**

To export PBP data reports to PDF currently requires health plans to complete a multi-step process in which plans must export the PBP data reports to Excel, then from Excel to PDF. Viewing the report in PDF is clearer and more user-friendly than viewing it in Excel format.

To reduce the number of steps necessary to export PBP data reports to PDF, we recommend CMS add the capability to export PBP Data Reports directly to PDF format.

### **Align Section C - OON and Section C - POS to Section B Service Category Setup**

The OON Grouping setup of the PBP software creates situations where there are more OON

benefit variations than groupings, which can cause data to be unclear when a user must enter multiple cost shares for multiple benefits in the same grouping. Currently, Section C - OON and Section C - POS restrict users to 15 groups of like cost sharing. This causes issues when plans have more than 15 variations in OON cost sharing for filed benefits.

We recommend that Section C - OON and Section C - POS be redesigned to align to the setup in Section B for Service Categories. Having alignment between Section B and Section C would eliminate the need to group benefits into common cost sharing. It would also result in more clear cost sharing descriptions in the Medicare Plan Finder and would reduce burden on plans when developing their own member materials.

We believe that these recommendations will improve the functionality of the PBP Software, making the completion of PBPs more efficient for health plans. These changes will also help health plans complete PBP quality checks, will generate clearer system reports, will support health plan PBP scalability, and will result in clearer Medicare Plan Finder cost sharing descriptions.

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

Sincerely,

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