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June 27, 2024

RE: The Medicare Advantage and Prescription Drug Programs: Part C and Part D Medicare Prescription Payment Plan Model Documents (CMS-10882)

Filed Electronically: www.regulations.gov

Dear Sir/Madam:

Thank you for this opportunity to offer our comments on the *Medicare Advantage and Prescription Drug Programs: Part C and Part D Medicare Prescription Payment Plan Model Documents*.

HealthPartners holds five contracts with the Centers for Medicare & Medicaid Services (CMS): H2422 (MA FIDE SNP), H2462 (1876 Cost), H3416 (MA-PD PPO), H4882 (MA-PD PPO), and S1822 (Employer Group-only PDP), and we offer Medicare plans in Minnesota, Wisconsin, Iowa, Illinois, North Dakota, and South Dakota. Our long history of participating in the Medicare program and serving Medicare beneficiaries goes back to 1985. Our comments are based upon our experience and learnings serving Medicare beneficiaries and applying CMS guidance.

We appreciate the opportunity to review the second draft of the MPPP model documents and do not have comments specific to those documents. Our comments are related to the additional materials that were not included in this package.

Other comments:

- **CMS-developed educational and other CMS-provided resources.** Given the communications and outreach must begin in the fourth quarter of this year for the 2025 plan year, we ask CMS to make every effort to finalize these documents as soon as possible and no later than July 2024, to allow Part D sponsors time and resources to implement timely.
- **Other model forms.** CMS did not include in this package a model denial notice for the Medicare Prescription Payment Plan. We request CMS confirm if a denial model notice will be included in future Part D enrollment/disenrollment chapter guidance. If a model will be issued, we ask CMS provide an opportunity for comments prior to finalizing.

Thank you for the consideration of our comments. If you have any questions regarding our comments, please feel free to contact me at Amy.L.Schultz@healthpartners.com.

Sincerely,

Amy L. Schultz
Director, Medicare Programs and Shared Services
HealthPartners