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To: Department of Health & Human Services  
Centers for Medicare & Medicaid Services  
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[alissa.deboy@cms.hhs.gov](mailto:alissa.deboy@cms.hhs.gov) and [Martique.Jones@cms.hhs.gov](mailto:Martique.Jones@cms.hhs.gov))

From: Barbara Reid, Compliance Manager  
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Date: December 8, 2009

Re: File No.: CMS-R-262, *CY 2011 Plan Benefit Package (PBP) Software and Formulary Submission*

We have reviewed the *CY 2011 Plan Benefit Package (PBP) Software and Formulary Submission* in response to the notice published under the Paperwork Reduction Act in the October 9, 2009 Federal Register (74 FR 52236) and provide the comment below.

The comment is provided on behalf of Ovations and other UnitedHealth Group affiliates, including AmeriChoice, that manage Medicare Advantage and Part D business (collectively "United").

Comment: During the programming of the Plan Benefit Package (PBP) last year CMS was working on programming that would copy PBP information from the previous year into the current PBP. Throughout the alpha and beta testing the functionality was working. When the final software was released, there was a copy function however it was not as complete as we had seen in testing. We would like to see a complete copy function for PBP data from previous year into the current year.

We greatly appreciate the opportunity to comment, and we look forward to continuing to work with CMS to develop successful products and services for Medicare beneficiaries. If you have any questions or concerns on our comment, please contact me at 715-832-5235 or via email at [barbara\\_reid@uhc.com](mailto:barbara_reid@uhc.com).