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January 6, 2025

William N. Parham, III  
Director, Paperwork Reduction Staff  
Office of Strategic Operations and Regulatory Affairs  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard  
Baltimore, Maryland 21244

RE: CMS Plan Benefit Package (PBP) and Formulary 2026 (CMS-R-262)

Dear Mr. Parham:

This letter is in response to the Centers for Medicare and Medicaid Services (CMS) agency information collection notice "CMS Plan Benefit Package (PBP) and Formulary 2026 (CMS-R-262)" as issued on November 6, 2024.

Humana Inc., headquartered in Louisville, Kentucky, is a leading health care company that offers a wide range of insurance products and health and wellness services that incorporate an integrated approach to lifelong well-being. Humana currently serves approximately 5.9 million beneficiaries enrolled in our Medicare Advantage (MA) plans and 2.9 million beneficiaries enrolled in our Medicare Part D Prescription Drug Plans (PDPs). As one of the nation's top contractors for MA, we are distinguished by our long-standing, comprehensive commitment to Medicare beneficiaries across the United States. These beneficiaries – a large proportion of whom depend upon the MA program as their safety net – receive integrated, coordinated, quality, and affordable care through our plans. Our perspective is further shaped by the comprehensive medical coverage we provide for Medicaid beneficiaries in seven states.

PRA List of Changes

CMS provides a list of change to the PBP and formulary documents for 2026, as well as screenshots to demonstrate the layout of the changes.

Humana Comment: The "PRA List of Changes" document provides a description of the proposed changes. However, the provided screenshots in the various "Appendix C" documents do not show the changes that are discussed in the "PRA List of Changes." Humana requests that CMS provide updated screenshots of the changes so that plans can adequately begin prep work for the 2026 plan year.

Additionally, for insulin products, we request clarification on whether plans can only list one of copay or coinsurance. Humana also requests additional clarification on whether plans have the

flexibility to reduce one or both options. For example, can a plan list a cost sharing amount as “25% up to \$25” or “15% up to \$35” for insulin. There is not enough information provided in the PRA List of Changes and no new screenshots of the display are provided in the Rx Insulin screens.

We hope that you consider our comments as constructive feedback aimed at ensuring that together we continue to advance our shared goals of improving the delivery of coverage and services in a sustainable, affordable manner to beneficiaries, focused on improving their total health care experience.

If you have any questions, please do not hesitate to reach out to me at [mhoak@humana.com](mailto:mhoak@humana.com) and 571-466-6673.

Sincerely,

A handwritten signature in black ink, appearing to read 'mhoak', written in a cursive style.

Michael Hoak  
Vice President, Public Policy