



August 27, 2025

Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1859

Submitted online: <https://www.reginfo.gov/public/do/PRAMain>

Re: Part C and Part D Medicare Prescription Payment Plan Model Documents

Dear Sir/Madam:

UnitedHealthcare (UHC) is responding to the Information Collection Request (ICR) for the Part C and Part D Medicare Prescription Payment Plan Model Documents. The ICR was published by CMS in the Federal Register on July 28, 2025 (90 FR 35529).

UHC offers a full range of health benefits, enabling affordable coverage, simplifying the health care experience and delivering access to high-quality care. UHC is the health benefits business of UnitedHealth Group, a health care and well-being company working to help build a modern, high-performing health system through improved access, affordability, outcomes and experiences. We are committed to a future where every person has access to high-quality, affordable health care and a modern, high-performing health system that reduces disparities, improves outcomes, and lessens the burden of disease.

UHC recommends CMS establish an implementation deadline for existing updated Medicare Prescription Payment Plan model documents of at least 60 days from publication of the final documents. Operational lead times for documents necessitate planning for publication and mailing months in advance, and as a result, the CMS-required fourth quarter mailing of the "Likely to Benefit" Notice and other required Medicare Prescription Payment Plan documents are being created using last year's models. A change to the model documents this close to the CMS mailing deadline may delay the documents from arriving at members' homes in a timely manner, thus possibly impacting the member's pharmaceutical costs and harming the member's experience. UHC recommends that updated model documents become effective following the fourth quarter 2025 mailings and be used during the upcoming plan year.

Thank you for your thoughtful consideration of our comments. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jennifer Martin', with a horizontal line extending to the right.

Jennifer Martin
Director, Regulatory Affairs
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