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CMS-10139



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**Ovations**  
A UnitedHealth Group Company

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To: CMS, Office of Strategic Operations and Regulatory Affairs,  
Division of Regulations Development - C  
Attention: Bonnie L. Harkless  
Room C4-26-05,  
7500 Security Blvd.  
Baltimore, Maryland 21244-1850

From: Michael Warschauer, <sup>mw</sup> Compliance Manager

Date: September 7<sup>th</sup>, 2007

Re: Draft 2009 Prescription Drug Plan Applications

We have reviewed the Draft 2009 Prescription Drug Plan Applications and provide the following attached comments. These comments are provided on behalf of Ovations and other UnitedHealth Group affiliates that manage Medicare Advantage and Part D business (collectively "United"). Please note that, for the purposes of this letter, "United" includes the Ovations business units that manage the combined PacifiCare and Ovations legacy Part D business.

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 comments, please contact me at 614/410-7402 or via email [mwarscha@uhc.com](mailto:mwarscha@uhc.com).

**ORGANIZATION'S NAME:** UnitedHealth Group  
**DATE:** 08/29/07

**These comments apply to the following documents (please check one):**

MA\_PD Application  Employer Group (PFFS\_Direct) \_\_\_\_\_  
 Employer Group MA\_PD \_\_\_\_\_

Page Number	Part	Section Number/ Header	Comment	Suggestion (Insert, Delete, or Revise)
All	All MAPD	All	Our national HI and LTC pharmacy files uploaded to HPMS for our 2008 applications included approximately 5400 records. The estimated size of our national Retail Pharmacy file that needs to be uploaded in HPMS for each of our 2009 applications is 66,000 records. We will also be uploading pdf files and access analyses reports for the first time. We would like to be able to submit a "test application" in Nov. or Dec 2007 in order to determine the amount of time and resources needed to upload our 2009 applications	Request the ability to test a Part D HPMS application upload prior to the time the Final Applications are released in order to determine time and staffing needs.
57 PDP	3.22	Billing	The PDP sponsor has no visibility to SSA to know when the Premium Withhold status has changed. The PDP sponsor can only rely on CMS for Premium Withhold Status	Revise

<b>ORGANIZATION'S NAME: UnitedHealth Group</b>				
<b>DATE: 08/29/07</b>				
These comments apply to the following documents (please check one):				
MA_PD Application <input checked="" type="checkbox"/> Employer Group (PFFS_Direct) _____				
Employer Group MA_PD _____				