

Centers for Medicare and Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development-C
Attention: Bonnie L. Harkless
Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850



Dear Ms. Harkless,

We received CMS' request for comments on the 2009 Bid Pricing Tool and Plan Benefit software. We compiled the following list of comments:

1. In the 2008 PBP Software, the Inpatient Mental Health benefit does not appear on the Summary of Benefits when we select a non-Medicare cost share for Inpatient Hospital but select a Medicare cost share for Inpatient Mental Health benefit. CMS confirmed that this was a problem, but told us that it would not be addressed for the 2008 bids.
2. It would help to have a spreadsheet-like view of all plans and their benefits within the PBP software. Ideally, we would be able to change benefits from this view. The column headings would be contract and plan numbers and the row headings would be question numbers from the PBP. This would allow for comparison of similar benefits across plans and would aid in accuracy and consistency.

If you have any questions about our comments, please contact me at 443-224-4752. We look forward to working with you throughout 2008.

Sincerely,

A handwritten signature in black ink that reads 'Stephen Carrier'.

Stephen Carrier