

Chapter, Section, Page	Comments	Rationale	Benefit
Chapter 4 EOC pg 65, What you pay for your Part D prescription drugs (chart) & Explanation of Benefits Clarification to language in relation to dispensing fees	Plan recommends corrections to the following area of the EOC & EOB model: In the Stage 3 Coverage Gap , the models state what the member pays for the portion of brand drugs plus a portion of the dispensing fee. The language should be clarified to read that the member pays 40%, with no separate reference to the dispensing fee.	The language update/clarification would be in alignment with requirements introduced several years ago in relation to PBP requirements.	As the EOC and EOB models read today, the current language for dispensing fees for brand drugs is inconsistent and could be confusing to the enrollee.
Web Posting Agency Appendix section of EOC	1. The plan requests CMS consideration to allow plans to post the Agency Appendix information in the EOC for national plans online with printed copy to be provided on request. 2. Plan recommends simplifying the language in the EOC (e.g., including more generic language that would apply to both LIS and non-LIS enrollees).	This would allow the plan the flexibility to post the state agency contact information referenced in Chapter 2 of the EOC on the plan’s website instead of in an appendix that can be as large as 30-pages when all regions are included. Chapter 2 of the EOC would direct the beneficiary to the website instead of the appendix. This would also allow updates to be made to the content if needed throughout the year. The contact information/appendix could be mailed to a beneficiary upon request. 2. Updating the language in relation to both subsidized and non-subsidized enrollees would improve beneficiary understanding of the document as well as improve operational production efficiencies.	Removing a large section of the document from the <i>printed</i> model that applies to a small percentage of membership will increase the relevancy of the remaining document and improve our members’ ability to digest the plan information. The agency index information would be readily available on the plan website.
HPMS reporting for ANOC/EOC mailing waves	The plan recommends modification to the HPMS reporting for AMD (Actual Mail Date) for the ANOC/EOC mailing periods. Plan requests CMS consideration of changing the HPMS reporting process to have <i>one</i> final report of all the waves loaded into HPMS at the end of the mailing season vs. the weekly reporting that is required today.	Reduce plan administrative burden.	Reduce plan administrative burden.

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Annual CMS Issuance of Marketing Models & Corrections	<p>1. The plan requests consideration of CMS issuing all marketing and non-marketing models and associated corrections by no later than 7/15 annually. Receiving updates after this timeframe critically impacts the production for the ANOC/EOC model.</p> <p>2. Further, should CMS published corrections after the 7/15 date for the ANOC/EOC, plans would be allowed to implement those changes on a go-forward basis after the 9/30 mailing process is complete.</p>	Based on the current deadline to produce and mail the ANOC/EOC, the 7/15 deadline would ensure timeliness and accuracy of this important document and allow plans 60 days prior to mailing to compile and produce materials.	Allow plan sufficient time to produce these important materials without introducing additional changes that would be required to be incorporated for the 9/30 delivery date.