

Plan Benefit Package (PBP) Software

Comment:

Section C

Number of Out-of-Network Groups

The current limit on the number of out-of-network groups in Section C has negatively impacted UHC's ability to enter intended benefits in the cost sharing fields. When we reach the limit, we must file benefits in out-of-network groups that do not align with their intended cost share. We then add a note to explain which cost share is applicable to each benefit. UHC requests that CMS increase the limit of out-of-network groups in the PBP software or align to in-network data entry. This would allow out-of-network plan benefits to be more accurately captured in the filing, reduce the number of filed notes, and provide better data for members in Medicare Plan Finder and the Medicare & You Handbook.

Response: Currently organizations can create maximum of 15 out-of-network groups in the PBP software. CMS will evaluate the requirement of increasing the maximum number of out-of-network group for future PBP software enhancement.

Comment:

General

Year-Over-Year Tracking

In order to help organizations track Year-Over-Year (YOY) benefit changes during PBP entry, it would be helpful if CMS were to implement functionality in the PBP software such that when an organization changes a benefit in the PBP, that PBP field changes to a different color so as to clearly delineate the change. We recommend that CMS introduce this PBP software functionality.

Response: CMS will look into evaluating the feasibility of adding this feature for future requirement. In the meantime, organizations may run PBP benefit reports and compare the responses to see the differences between reports and evaluate what has changed.

Comment:

General

Planning, Creation and Testing

UHC would like to be involved in any potential changes to bid submission and offers our assistance in designing, implementing and testing any new functionality. We use the current CMS process and tools for our internal readiness every year. Thus, potential changes in the PBP software or overall bid submission process would impact our planning. The ability to understand and implement any changes timely will be critical to serving our members and meeting CMS' timelines for 2021 bid submission.

Response: CMS appreciates organizations showing the interest in helping improve the PBP. CMS will communicate opportunities for plan feedback and input.