









Common Theme	Summary of Comment	Proposed Responses
	<p>A commenter suggested that CMS provide an illustration or visual aid in the Election Approval notice to help enrollees understand the mechanics of monthly payments.</p>	<p>CMS encourages sponsors to provide additional information, tools, and visualizations to best serve their Part D enrollees and ensure they properly understand the program and how it may benefit them. As stated in section 30.1.5 of the draft part two guidance, Part D sponsors are required to provide examples of how the program calculation works with easy-to-understand explanations; sponsors may utilize a calculator tool to help fulfill this requirement. CMS encourages Part D sponsors to use the example calculations included in the final part one guidance or in the technical memoranda available here: <a href="https://www.cms.gov/inflation-reduction-act-and-medicare/part-d-improvements/medicare-prescription-payment-plan">https://www.cms.gov/inflation-reduction-act-and-medicare/part-d-improvements/medicare-prescription-payment-plan</a>. Part D sponsors are also encouraged to use CMS-provided resources as outlined in section 40 of the draft part two guidance.</p>
X	<p>A commenter suggested edits to the Voluntary Termination notice to improve readability and plain language.</p>	<p>CMS thanks the commenter for their careful review of the Notification of Voluntary Removal and has made revisions to improve readability and plain language throughout the document.</p>
	<p>A commenter expressed concern that referring to the program as a "payment option" in the Voluntary Termination notice could confuse beneficiaries who think of "payment options" as payment through the mail or credit/debit card.</p>	<p>CMS appreciates the commenter's concerns regarding potential confusion around the new program and shares the commenter's goal of making model materials clear, concise, and easy to understand. To this end, CMS performed multiple rounds of focus group testing with a representative sample of Medicare Part D enrollees to evaluate the materials and products newly developed for the Medicare Prescription Payment Plan. The language in the model materials reflects the feedback received during consumer testing.</p>
X	<p>Some commenters requested that CMS add language to the Voluntary Termination notice making clear that voluntary termination does not require an enrollee to pay an immediate lump sum in full; other commenters requested CMS emphasize the need for payment of any outstanding balance under the Medicare Prescription Payment Plan even when participation is ended voluntarily. A commenter suggested that CMS remove specific unpaid amounts from the "How Do I Pay My Balance" section and refer enrollees to monthly invoices for information on unpaid amounts.</p>	<p>CMS thanks the commenters for their feedback and has revised the language related to payment of outstanding balances. The Notification of Voluntary Removal states "You'll continue to be billed monthly, or you can choose to pay the amount you owe all at once. You'll never pay any interest or fees on the amount you owe. Contact &lt;plan name&gt; if you have questions about paying your balance."</p>
X	<p>Commenters requested to differentiate voluntary termination as a result of plan switching from voluntary termination as a result of no longer wanting to participate in the program in the Voluntary Termination notice. Commenters asked CMS to specify that there may still be payments owed to their former plan and enrollees must re-elect the program under their new plan.</p>	<p>CMS thanks the commenters for their suggestion and has revised the Notification of Voluntary Removal to provide plan sponsors with the option to tailor the notice based on the reason for voluntary termination. This will reduce potential enrollee confusion. The notice also states that unpaid balances will continue to be paid monthly, unless the enrollee chooses to pay the amount they owe all at once, and provides information about how the enrollee may elect into the Medicare Prescription Payment Plan in the future under a new Part D plan.</p>
X	<p>Several commenters requested that CMS provide clarity on plan sponsors' ability to make changes to the Voluntary Termination notice, including the ability to add other payment methods, add an address or mailing instructions for payments by mail, remove the sections "How do I pay my balance?" and "What happens if I don't pay my balance?" if the member does not owe a balance, and make the Rx ID, Rx Group, Rx Bin, and Rx PCN optional fields.</p>	<p>CMS thanks the commenters for their feedback and has provided additional instructions to plan sponsors in the model notice indicating where they may make changes to the notice. The Rx ID, Rx Group, Rx Bin, and Rx PCN fields are all optional for sponsors to include.</p>
	<p>A commenter recommended that CMS clarify whether, in situations where a beneficiary makes a mid-year plan change within the same parent organization, the parent organization has the ability to automatically transfer the beneficiary's Medicare Prescription Payment Plan election to their new plan, and to address this circumstance in the Voluntary Termination notice.</p>	<p>CMS thanks the commenter for the question. As discussed in section 70.4 of the Medicare Prescription Payment Plan: Final Part One Guidance on Select Topics, Implementation of Section 1860D-2 of the Social Security Act for 2025, and Response to Relevant Comments, when a Part D enrollee disenrolls from a Part D plan, such as when switching plans during the coverage year or for a subsequent coverage year, their participation in the Medicare Prescription Payment Plan, as administered by the Part D sponsor losing the enrollee, effectively ends. This is the case even when the first plan and second plan are administered by the same Part D sponsor. The Part D sponsor of the new plan may not automatically sign up the individual for the Medicare Prescription Payment Plan under the individual's new plan. The Part D enrollee may choose to elect into the program with the new Part D plan, regardless of any balance owed to the Part D plan sponsor of the prior plan.</p>
X	<p>A commenter noted that the variable "Date" is missing from the Voluntary Termination notice.</p>	<p>CMS thanks the commenter for their feedback. The variable "Date" has been added to the model notice.</p>
X	<p>Many commenters suggested edits to the Initial Notice of Failure to Pay to improve readability and plain language and provide additional information. These suggestions included further differentiating the bills for Part D premiums and Medicare Prescription Payment Plan balances, clarifying that the notice is not referring to missed payment or possible termination from the enrollee's Part D plan, and clarifying that responsibility for out-of-pocket costs after termination from the program will be limited to the enrollee's remaining share of out-of-pocket costs up to the \$2,000 threshold.</p>	<p>CMS thanks the commenter for their careful review of the Initial Notice of Failure to Pay and has made revisions to improve readability and plain language throughout the document.</p>
X	<p>A couple of commenters expressed concern that using language in the Initial Notice of Failure to Pay such as "urgent" is too harsh and suggested revisions to soften the messaging; other commenters encouraged CMS to emphasize the urgency of past due payments.</p>	<p>CMS appreciates the commenters' concerns. Part D sponsors may insert a title for the notice; the suggested title provided by CMS has been revised to "Reminder: Pay your Medicare</p>
X	<p>Some commenters expressed concern that the sentence in the Initial Notice of Failure to Pay stating "like any other debt, you're required to pay the amount you owe" could be too harsh or confusing, since the next sentence says that enrollees will keep their drug coverage as long as they pay their premium.</p>	<p>CMS appreciates the commenters' concerns and has updated the language for additional clarity. "You're required to pay the amount you owe. You won't pay any interest or fees on the amount you owe, even if your payment is late. If you're removed from the Medicare Prescription Payment Plan, you'll still be enrolled in &lt;plan name&gt;."</p>
X	<p>A commenter recommended that plans state the actual date of the deadline for payment in the Initial Notice of Failure to Pay.</p>	<p>CMS thanks the commenter for their suggestion and notes that the first paragraph of the Notice for Failure to Make Payments includes a field for the plan sponsor to insert the payment due date. ("To stay in the Medicare Prescription Payment Plan, you must pay &lt;insert the full amount or a partial amount(s) should the plan choose to allow enrollees to pay the balance over separate payments&gt; by &lt;insert date for the end of the grace period (i.e., the date that is two calendar months from the first day of the month for which the balance is unpaid or the first day of the month following the date on which the payment is requested, whichever is later)&gt;.")</p>
X	<p>A couple of commenters requested that CMS remove the language in the Initial Notice of Failure to Pay indicating that a Medicare Prescription Payment Plan payment can be redirected to the enrollee's premium. Commenters noted that the management of the program may be delegated to a plan's PBM and the PBM/vendor would have to coordinate with the plan to apply a Program's payment to premiums, introducing further complexities and potential for error.</p>	<p>CMS thanks the commenters for their feedback and has removed this language from the Notice for Failure to Make Payments. As stated in section 40.1 of the final part one guidance, Part D sponsors are required to prioritize payments towards Part D plan premiums to avoid a Part D enrollee losing their Part D coverage when it is unclear whether a payment received from a participant is intended by the participant to cover their outstanding Part D plan premium or Medicare Prescription Payment Plan balance.</p>
X	<p>Several commenters requested that CMS include additional information in the Initial Notice of Failure to Pay about the process of reinstatement, or how an enrollee can re-elect the program after being terminated.</p>	<p>CMS thanks the commenters for their feedback. The Notice for Failure to Make Payments and the Notice for Failure to Make Payments - Notification of Termination of Participation both direct enrollees to contact their plan to opt back into the program (once they've paid all outstanding balances, if applicable).</p>

