

#	Common Theme	Independence Blue Health	Blue Cross Blue Shield of Tennessee	Tamara Johnson	PrimeWest Health	BCBS of MN	CVS Health	Alliance for Aging Research/PAN Foundation	Ucare	Kaiser Permanente	ET Lilly	Biotechnology Innovation Organization	BCBS Association	MAPRC Coalition	PhRMA	Medicare Rights Center	Summary of Comment	Proposed Responses
1												X		X	X	X	Several commenters expressed appreciation for CMS's efforts to improve beneficiary communications, including enhancements to clarity, readability, and accessibility of the model documents. Commenters commended the addition of the Notice of Participation Renewal and the additional translated versions of the Likely to Benefit Notice. Commenters encouraged further expansion of translated materials across all model documents.	CMS thanks the commenters for their support.
2				X													A commenter expressed concern that CMS's burden estimates for information collections are too narrow and exclude significant one-time implementation costs including system integration, template adaptation, and staff training. The commenter recommended CMS adopt a dual-component framework that separates initial implementation burdens from ongoing operational costs.	In Supporting Statement A, CMS has accounted for one-time implementation costs associated with new model materials, specifically the notice of participation renewal. This includes discrete burden estimates for "MPPP Auto-Renewal Development (One-Time Burden)" and "MPPP Set Up Systems for Auto-Renewal (One-Time Burden)" and is separate from annual burden estimates for distribution of the model materials. CMS believes these estimates sufficiently address the commenter's concerns regarding initial implementation costs. CMS will continue to monitor operational impacts and consider additional refinements to burden estimates in future reviews of this information collection request package.