Program<br/>ChangesElimination of<br/>Coverage GapNew Out-of-Pocket<br/>Maximum2025 TrOOP<br/>ScenariosFAQs2025 Agent Quick Reference Guide**Dart DoverviewDart Doverview2025 Program Changes**For 2025, there will be changes to the Part D program as a result of the Inflation Reduction Act, impacting

both stand-alone Part D and Medicare Advantage Prescription Drug Plans. It is important that you are informed on these changes to help members understand how they may be impacted and be prepared to support them.

## **Inflation Reduction Act**

The Inflation Reduction Act (IRA) was signed into law on August 16<sup>th</sup>, 2022. The law includes provisions that are focused on lowering prescription drug costs for people with Medicare and reducing costs to the Federal Government.

These regulations include a redesign of the Part D program for 2025, which will be described in detail on the following pages.

### 2023-2025 IRA Changes to Part D

2023	2024	2025
<ul> <li>\$0 cost-sharing for adult vaccines</li> <li>\$35 cap on Part D Insulin cost-share <ul> <li>Part D Start: 1/2023</li> <li>Part B Start: 7/2023</li> </ul> </li> <li>Inflationary rebates for Parts B and D <ul> <li>Start: 10/2022</li> </ul> </li> </ul>	<ul> <li>Pharmacy network DIR at point-of-sale changes</li> <li>Annual increase in national average premium cap (through 2029)</li> <li>Expansion of low-income cost-sharing and premium subsidy eligibility (from 135% FPL to 150% FPL)</li> <li>Member pays \$0 in the Catastrophic stage</li> </ul>	<ul> <li>Part D Benefit Redesign:</li> <li>Elimination of the Coverage Gap ("donut hole") <ul> <li><u>See page 2</u></li> </ul> </li> <li>Reallocation of costs in the Catastrophic stage <ul> <li><u>See page 2</u></li> </ul> </li> <li>\$2,000 maximum true outof-pocket (TrOOP) <ul> <li><u>See pages 3-5</u></li> </ul> </li> <li>New Manufacturer Discount Program <ul> <li><u>See page 5</u></li> </ul> </li> <li>Medicare Prescription Payment Plan <ul> <li><u>See page 5</u></li> </ul> </li> </ul>

# The following does <u>not apply</u> to <u>Part B or non-Part D medications</u> (i.e. bonus drug list, vitamins, erectile dysfunction med)

- Medicare Prescription Payment Plan (M3P)
- \$2,000 maximum true out of pocket amount

## 2025 Part D Overview

# **Elimination of the Coverage Gap**

The Coverage Gap stage, or "Donut Hole", is going away in 2025. Members will now have three drug payment stages as part of their Part D benefit:



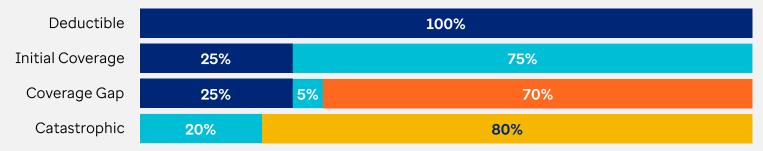
**Deductible Stage**: If a member's plan has a prescription drug deductible, they will pay the full cost for their drugs until they reach the deductible amount; then they move to the Initial Coverage stage.

2

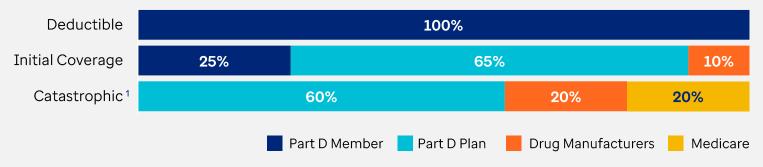
**Initial Coverage Stage:** Members will pay their plan copays or coinsurance, and the Part D plan (or Drug Manufacturers) will pay the rest. Once the member, and others on their behalf, have paid a combined total of \$2,000 (including any amounts paid toward a deductible), they move to the Catastrophic Coverage stage.

**Catastrophic Coverage Stage:** Members won't pay anything for Part D covered drugs for the rest of the plan year. The Part D plan will be responsible for most costs in this stage.

## 2024 Part D Benefit Design



## 2025 Part D Benefit Design



## Reallocation of Costs in the Catastrophic Stage

For 2025, the cost responsibilities in the Catastrophic stage have shifted. Medicare will now pay a smaller portion of the costs (20% for brand, 40% for generics) and the Part D plan will be responsible for paying a higher share of the costs (60% in 2025 vs. 20% in 2024).

Members who typically reach the coverage gap may benefit from lower out-of-pocket costs in 2025.

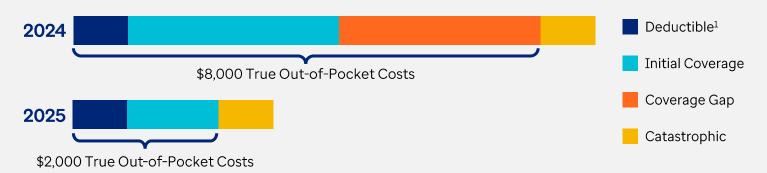
<sup>1</sup> Represents Defined Standard cost sharing for brand drugs; for generics, Medicare pays 40% and Drug Manufacturers have zero responsibility.

#### 2025 Part D Overview

# New Annual True Out-of-Pocket Maximum

In 2025, there is a new \$2,000 annual true out-of-pocket maximum (TrOOP), reduced from \$8,000 in 2024. TrOOP is the out-of-pocket drug cost that accumulates during the Deductible and Initial Coverage stages.

As a result, members may reach the Catastrophic stage more quickly (where they will have no drug cost responsibility) due to the elimination of the Coverage Gap and the lower TrOOP.



### 2025 TrOOP

The Part D Plan will calculate the TrOOP accumulation behind the scenes to determine when a member will move to the Catastrophic stage.

The amount that is applied towards a members' TrOOP is the greater of the amount paid by a member based on their plan's benefit design OR the cost share that the member would have under Medicare's Defined Standard Part D Plan. The Defined Standard Part D Plan is CMS' minimum benefit requirement for a Part D offering (either as a stand-alone PDP or within an MAPD plan).

Many UnitedHealthcare plans offer an enhanced Part D benefit instead of a Defined Standard benefit. Members on these plans may see their TrOOP accumulation differ from their actual out-of-pocket costs. **Agents do not need to know how to calculate the TrOOP but may want to understand the logic for general awareness.** 

#### Example 1

Member's plan cost-share Defined Standard plan cost-share

\$20
\$40

In Example 1, the \$40 is applied to TrOOP because it is the greater amount.

## Example 2

Member's plan cost-share Defined Standard plan cost-share

$\frown$
(\$17)
\$35

Medicare Defined

Standard Part D Plan Design:

\$590

**Rx** Deductible

25% Cost-Share

In Example 2, the \$47 is applied to TrOOP because it is the greater amount.

Member's TrOOP accumulation may differ from their actual out-of-pocket costs. True Out-of-Pocket (TrOOP) Costs are calculated based on the plan year. Each Medicare plan submits a record of the member's drug coverage levels to Medicare. When a member switches plans mid-year, the TrOOP and Drug Spend amounts are obtained from the member's prior plan and accumulated on the member's new plan.

<sup>1</sup> The Deductible stage is only applicable if the plan includes a Rx Deductible in the plan design. Not all plans include a Rx Deductible.

Program	Elimination of	New Out-of-Pocket	2025 TrOOP	FAQs		
Changes	Coverage Gap	Maximum	Scenarios			

#### 2025 Part D Overview 2025 TrOOP Scenarios

The scenarios below reflect a member's costs for a \$1,000 drug under the 2024 and 2025 Part D program. For 2025, the TrOOP is calculated by comparing the member's enhanced alternative plan cost-share to the Medicare Defined Standard cost and applying the higher of the two amounts to the TrOOP accumulator.

<b>Scenarios 1-2</b> <b>Enhanced Alt. Part D Benefit</b> Drug Cost: \$1,000 Tier 3 Copay: \$47 Rx Deductible: \$0 (no deductible)					Scenario 3 Enhanced Alt. Part D Benefit Drug Cost: \$1,000 Tier 3 Copay: \$47 Rx Deductible: \$300 (Tiers 3-5)				M De De	Scenario 4 Medicare Defined Standard Benefit Defined Standard Rx Deductible: \$590 Defined Standard Cost-Share: 25%					
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Total	
1	2024 Member Cost (\$0 Rx Ded.)	\$47	\$47	\$47	\$47	\$47	\$250	\$250	\$250	\$250	\$250	\$250	\$250	\$1,985	
2	2025 Member Cost (\$0 Rx Ded.)	\$47	\$47	\$47	\$47	\$47	\$47	\$47	\$0	\$O	\$0	\$0	\$0	\$329	
3	2025 Member Cost (\$300 Rx Ded. T3-5)	\$347	\$47	\$47	\$47	\$47	\$47	\$47	\$0	\$O	\$0	\$0	\$0	\$629	
4	2025 Defined Standard	\$693	\$250	\$250	\$250	\$250	\$250	\$57	-	-	-	_	-	\$2,000	
٨	Ionthly TrOOP Accumulator	\$693	\$943	\$1,193	\$1,443	\$1,693	\$1,943	\$2,000							
Jan. 2025 TrOOP Calculation: Deductible \$590 + remaining drug cost \$410 * 25%					Feb-Jun 2025 TrOOP Calculation: \$1,000 drug cost * 25% = <b>\$250</b>				<b>July 2025 TrOOP Calculation:</b> \$2,000 maximum - \$1,943 = <b>\$57</b> remaining						

\$590 + (\$410\*.25) = \$692.50

Scenario 1 shows the member's cost under the 2024 Part D program. The member pays the \$47 plan copay until they reach the gap in June. They remain in the gap for the rest of the year paying \$250/month and \$1,985 in total annual costs.

Scenarios 2 & 3 show the member's cost under the 2025 Part D program with the same plan design but applying the new TrOOP calculation and \$2,000 maximum. The difference is that Scenario 2 has no Rx deductible and Scenario 3 has a \$300 Rx deductible for Tiers 3-5.

- Scenario 2: In January, the member pays a \$47 plan copay, however \$693 would apply to the TrOOP accumulator because the Defined Standard amount is higher than the member's cost.
- Scenario 3: In January, the member pays the \$300 deductible plus the plan's \$47 copay, for a total of \$347. Again, \$693 applies to the TrOOP accumulator because the Defined Standard amount is higher than the member's cost.

In both scenarios, the member reaches the Catastrophic stage in August when the TrOOP accumulator reaches \$2,000. The member pays \$0 for the rest of the year even though the member's total out-of-pocket cost is below \$2,000.

- Scenario 2: The member pays \$329 in total Rx costs for the year; \$1,656 less than in 2024.
- Scenario 3: The member pays \$629 in total Rx costs for the year; \$1,356 less than in 2024. Even with an Rx • deductible the member has a decrease in annual Rx costs for 2025.



TrOOP calculations will happen in the background. Agents and consumers do not need to know how to calculate the costs but should know that the TrOOP accumulation may differ from what the member pays out-of-pocket.

## 2025 Part D Overview

## Frequently Asked Questions

# When a member switches plans mid-year, are they responsible for paying the new plan's Part D deductible?

When a member switches from one plan with Part D coverage to another mid-year, the amount the member has spent toward their True Out-of-Pocket (TrOOP) transfers with them to their new plan – even when switching carriers (or not) and when switching between product types: PDP to MAPD, PDP to PDP, MAPD to MAPD, or MAPD to PDP. All Part D drug spend amounts reset on January 1 of each year.

#### What is the New Manufacturer Discount Program?

In 2025, CMS has introduced a new program that replaces the Coverage Gap Discount Program.

- 10% discount on brand name drugs during the Initial Coverage stage.
- 20% in the Catastrophic stage.
- Discounts applied at the point-of-sale.
- Members become eligible for the new discount program after they have reached the Medicare Defined standard deductible amount.
- Purchases made with discount cards are considered off-benefit and do not count toward a member's accumulator.
- Members will not necessarily know which brand name drugs will be cheaper for them under the new discount program. Applicable drugs under the discount program are Part D drugs approved under a New Drug Application (brands) or under the Public Health Service Act (biologics). Like the previous Coverage Gap Discount Program, there isn't a list of eligible medications.
- Members will not see the discount on their Explanation of Benefits (EOB), or otherwise know they benefited from a manufacturer discount.
- Manufacturer discounts do not apply to the TrOOP calculation.
- This program applies to stand-alone Prescription Drug plans and Medicare Advantage plans with prescription drug coverage.

#### What is the Medicare Prescription Payment Plan?

Beginning in 2025, CMS has introduced the Medicare Prescription Payment Plan offering members the option to pay \$0 at the point-of-sale for their Part D drugs, and instead, pay for their prescriptions through a monthly payment program during the calendar year. This program applies to stand-alone Prescription Drug plans and Medicare Advantage plans with prescription drug coverage.

This program does not provide any savings to the member. Members will pay the same annual out-of-pocket costs but will have their prescription costs distributed differently. This option may not be right for all members and may lead to confusion and / or complaints.

UnitedHealthcare is required by CMS to proactively reach out to members who may be a good fit for the program once their coverage begins. Agents are not required to mention or explain this program. Members with questions should be directed to Customer Service.

For more information on the Medicare Prescription Payment Plan, check out the Quick Reference Guide on Jarvis (Jarvis > Knowledge Center > <u>Reference Guides</u>).

UnitedHealthcare also has a member education website located here: <u>What is the Medicare Prescription Payment</u> <u>Plan? | UnitedHealthcare (uhc.com)</u>. Also check out <u>What's the Medicare Prescription Payment Plan? | Medicare</u> from Medicare.gov.