# **2023 Annual Notice of Changes**

Jan. 1, 2023 - Dec. 31, 2023

888-645-6025 | TTY 711

Seven Days a Week, 8 A.M. to 8 P.M. (October 1 to March 31)

Monday-Friday, 8 A.M. to 8 P.M. (All Other Times)



Blue Retiree Rx Plus Drug Plan (PDP)

## Blue Retiree Rx Plus<sup>SM</sup> (PDP) offered by BlueCross BlueShield of South Carolina

## **Annual Notice of Changes for 2023**

You are currently enrolled as a member of Blue Retiree Rx Plus. Next year, there will be changes to the plan's costs and benefits. *Please see page 3 for a Summary of Important Costs, including Premium.* 

This document tells about the changes to your plan. To get more information about costs, benefits, or rules please review the *Evidence of Coverage*, which is located on our website at <a href="https://www.scbluesmedadvantage.com">www.scbluesmedadvantage.com</a>. You may also call Customer Service to ask us to mail you an *Evidence of Coverage*.

• You have from October 15 until December 7 to make changes to your Medicare coverage for next year.

#### What to do now

Plus.

1.	ASK: Which changes apply to you
	Check the changes to our benefits and costs to see if they affect you.
	• Review the changes to our drug coverage, including authorization requirements and costs
	• Think about how much you will spend on premiums, deductibles, and cost sharing
	Check the changes in the 2023 Drug List to make sure the drugs you currently take are still covered.
	Think about whether you are happy with our plan.
2.	COMPARE: Learn about other plan choices
	Check coverage and costs of plans in your area. Use the Medicare Plan Finder at <a href="https://www.medicare.gov/plan-compare">www.medicare.gov/plan-compare</a> website or review the list in the back of your <a href="https://www.medicare.gov/plan-compare">Medicare &amp; You 2023 handbook.</a>
	Once you narrow your choice to a preferred plan, confirm your costs and coverage on the plan's website.
3.	CHOOSE: Decide whether you want to change your plan

If you don't join another plan by December 7, 2022, you will stay in Blue Retiree Rx

• To change to a **different plan**, you can switch plans between October 15 and December 7. Your new coverage will start on **January 1**, **2023**. This will end your enrollment with Blue Retiree Rx Plus.

#### **Additional Resources**

- Please contact our Customer Service number at 1-888-645-6025 for additional information. (TTY users should call 711.) Hours are 8 a.m. to 8 p.m., Eastern Time, Monday through Friday. Our automated phone system handles calls received after 8 p.m. and on Saturdays, Sundays and holidays. From October 1 through March 31, we are available 8 a.m. to 8 p.m., Eastern Time, seven days a week.
- Customer Service has free language interpreter services available for non-English speakers. This information is available in alternate formats, including large print. Please call Customer Service if you need plan information in other formats.

#### **About Blue Retiree Rx Plus**

- Blue Retiree Rx Plus is a stand-alone prescription drug plan with a Medicare contract. Enrollment in Blue Retiree Rx Plus depends on contract renewal.
- When this document says "we," "us," or "our," it means BlueCross BlueShield of South Carolina. When it says "plan" or "our plan," it means Blue Retiree Rx Plus.

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## **Summary of Important Costs for 2023**

The table below compares the 2022 costs and 2023 costs for Blue Retiree Rx Plus in several important areas. **Please note this is only a summary of costs**.

Cost	2022 (this year)	2023 (next year)
Monthly plan premium*  *Your premium may be higher or lower than this amount. See Section 1.1 for details.	\$170.30	\$187.00
Part D prescription drug coverage (See Section 1.3 for details.)	Deductible: \$0  Copayment/Coinsurance for Preferred Retail (30-day supply) during the Initial Coverage Stage:  Drug Tier 1: \$0  Drug Tier 2: \$3  Drug Tier 3: \$20  Drug Tier 4: 40%  Drug Tier 5: 33%  Copayment/Coinsurance for Standard Retail (30-day supply) during the Initial Coverage Stage:  Drug Tier 1: \$5  Drug Tier 2: \$8  Drug Tier 3: \$27  Drug Tier 4: 45%  Drug Tier 5: 33%	Deductible: \$0  Copayment/Coinsurance for Preferred Retail (30-day supply) during the Initial Coverage Stage:  Drug Tier 1: \$0  Drug Tier 2: \$3  Drug Tier 3: \$20  Select Insulins: \$35  Drug Tier 5: 33%  Copayment/Coinsurance for Standard Retail (30-day supply) during the Initial Coverage Stage:  Drug Tier 1: \$5  Drug Tier 2: \$8  Drug Tier 3: \$27  Select Insulins: \$35  Drug Tier 4: 45%  Drug Tier 5: 33%

## **SECTION 1 Changes to Benefits and Costs for Next Year**

#### **Section 1.1 – Changes to the Monthly Premium**

Cost	2022 (this year)	2023 (next year)
Monthly premium	\$170.30	\$187.00
(You must also continue to pay your Medicare Part B premium unless it is paid for you by Medicaid.)		

- Your monthly plan premium will be more if you are required to pay a lifetime Part D late enrollment penalty for going without other drug coverage that is at least as good as Medicare drug coverage (also referred to as "creditable coverage") for 63 days or more.
- If you have a higher income, you may have to pay an additional amount each month directly to the government for your Medicare prescription drug coverage.
- Your monthly premium will be *less* if you are receiving "Extra Help" with your prescription drug costs. Please see Section 7 regarding "Extra Help" from Medicare.

## Section 2.2 – Changes to the Pharmacy Network

Amounts you pay for your prescription drugs may depend on which pharmacy you use. Medicare drug plans have a network of pharmacies. In most cases, your prescriptions are covered *only* if they are filled at one of our network pharmacies. Our network includes pharmacies with preferred cost sharing, which may offer you lower cost sharing than the standard cost sharing offered by other network pharmacies for some drugs.

There are changes to our network of pharmacies for next year. An updated *Pharmacy Directory* is located on our website at <a href="www.scbluesmedadvantage.com">www.scbluesmedadvantage.com</a>. You may also call Customer Service for updated provider information or to ask us to mail you a *Pharmacy Directory*. **Please** review the 2023 *Pharmacy Directory* to see which pharmacies are in our network.

It is important that you know that we may make changes to the pharmacies that are part of your plan during the year. If a mid-year change in our pharmacies affects you, please contact Customer Service so we may assist.

## Section 1.3 – Changes to Part D Prescription Drug Coverage

#### **Changes to Our Drug List**

Our list of covered drugs is called a Formulary or "Drug List." A copy of our Drug List is provided electronically.

We made changes to our Drug List, including changes to the drugs we cover and changes to the restrictions that apply to our coverage for certain drugs. Review the Drug List to make sure your drugs will be covered next year and to see if there will be any restrictions.

Most of the changes in the Drug List are new for the beginning of each year. However, during the year, we might make other changes that are allowed by Medicare rules. For instance, we can immediately remove drugs considered unsafe by the FDA or withdrawn from the market by a product manufacturer. We update our online Drug List to provide the most up to date list of drugs.

If you are affected by a change in drug coverage at the beginning of the year or during the year, please review Chapter 7 of your *Evidence of Coverage* and talk to your doctor to find out your options, such as asking for a temporary supply, applying for an exception and/or working to find a new drug. You can also contact Customer Service for more information.

#### **Changes to Prescription Drug Costs**

**Note:** If you are in a program that helps pay for your drugs ("Extra Help"), **the information about costs for Part D prescription drugs may not apply to you.** We sent you a separate insert, called the "Evidence of Coverage Rider for People Who Get Extra Help Paying for Prescription Drugs" (also called the "Low Income Subsidy Rider" or the "LIS Rider"), which tells you about your drug costs. If you receive "Extra Help" and you haven't received this insert by September 30, 2022, please call Customer Service and ask for the "LIS Rider."

There are four "drug payment stages."

The information below shows the changes to the first two stages – the Yearly Deductible Stage and the Initial Coverage Stage. (Most members do not reach the other two stages – the Coverage Gap Stage or the Catastrophic Coverage Stage.)

**Important Message About What You Pay for Vaccines -** Our plan covers most Part D vaccines at no cost to you. Call Customer Service for more information.

**Important Message About What You Pay for Insulin** - You won't pay more than \$35 for a one-month supply of each insulin product covered by our plan, no matter what cost-sharing tier it's on.

#### **Changes to the Deductible Stage**

Stage	2022 (this year)	2023 (next year)
Stage 1: Yearly Deductible Stage	Because we have no deductible, this payment stage does not apply to you.	Because we have no deductible, this payment stage does not apply to you.

## **Changes to Your Cost Sharing in the Initial Coverage Stage**

Please see the following chart for the changes from 2022 to 2023.

Stage	<b>2022</b> (this year)	<b>2023</b> (next year)
Stage 2: Initial Coverage Stage Once you pay the yearly	Your cost for a one-month supply at a network pharmacy:	Your cost for a one-month supply at a network pharmacy:
deductible, you move to the	Tier 1 (preferred generic):	Tier 1 (preferred generic):
Initial Coverage Stage. During this stage, the plan pays its	Standard cost sharing: You pay \$5 per prescription.	Standard cost sharing: You pay \$5 per prescription.
share of the cost of your drugs, and you pay your share of the cost.	Preferred cost sharing: You pay \$0 per prescription.	Preferred cost sharing: You pay \$0 per prescription.
	Tier 2 (generic):	Tier 2 (generic):
The costs in this row are for a one-month (30-day) supply when you fill your prescription	Standard cost sharing: You pay \$8 per prescription.	Standard cost sharing: You pay \$8 per prescription.
at a network pharmacy. For information about the costs for	Preferred cost sharing: You pay \$3 per prescription.	Preferred cost sharing: You pay \$3 per prescription.
a long-term supply or for mail-	Tier 3 (preferred brand):	Tier 3 (preferred brand):
order prescriptions, look in Chapter 4, Section 5 of your Evidence of Coverage.	Standard cost sharing: You pay \$27 per prescription.	Standard cost sharing: You pay \$27 per prescription.
We changed the tier for some	Preferred cost sharing: You pay \$20 per prescription.	Preferred cost sharing: You pay \$20 per prescription.
of the drugs on our Drug List. To see if your drugs will be in a different tier, look them up on the Drug List.	Tier 4 (non-preferred	<b>Select Insulins:</b>
	drug): Standard cost sharing: You pay 45% of	Standard cost-sharing: You pay \$35 per prescription.
	the total cost.  Preferred cost sharing: You pay 40% of the total cost.	Preferred cost-sharing: You pay \$35 per prescription.

Stage	2022 (this year)	2023 (next year)
Stage 2: Initial Coverage Stage (continued)	Tier 5 (specialty):  Standard cost sharing: You pay 33% of the total cost.	Tier 4 (non-preferred drug): Standard cost sharing: You pay 45% of the total cost.
	Preferred cost sharing: You pay 33% of the total cost.	Preferred cost sharing: You pay 40% of the total cost. Tier 5 (specialty):
	Once your total drug costs have reached \$4,430, you will move to the next stage (the Coverage Gap Stage).	Standard cost sharing: You pay 33% of the total cost.
		Preferred cost sharing: You pay 33% of the total cost.
		Once your total drug costs have reached \$4,660, you will move to the next stage (the Coverage Gap Stage).

For information about your costs in these stages, look at Chapter 4, Sections 6 and 7, in your *Evidence of Coverage*.

## **SECTION 2 Deciding Which Plan to Choose**

## Section 2.1 – If You Want to Stay in Blue Retiree Rx Plus

**To stay in our plan, you don't need to do anything.** If you do not sign up for a different plan by December 7, you will automatically be enrolled in our Blue Retiree Rx Plus.

## Section 2.2 – If You Want to Change Plans

We hope to keep you as a member next year, but if you want to change plans for 2023, follow these steps:

#### **Step 1**: Learn about and compare your choices

- You can join a different Medicare prescription drug plan,
- -- OR-- You can change to a Medicare health plan. Some Medicare health plans also include Part D prescription drug coverage,
- -- OR-- You can keep your current Medicare health coverage and drop your Medicare prescription drug coverage.

To learn more about Original Medicare and the different types of Medicare plans, use the Medicare Plan Finder (<a href="www.medicare.gov/plan-compare">www.medicare.gov/plan-compare</a>), read the *Medicare & You 2023* handbook, call your State Health Insurance Assistance Program (see Section 4), or call Medicare (see Section 6.2).

As a reminder, BlueCross BlueShield of South Carolina offers other Medicare health plans AND/OR Medicare prescription drug plans. These other plans may differ in coverage, monthly premiums, and cost-sharing amounts.

#### Step 2: Change your coverage

- To **change to a different Medicare prescription drug plan**, enroll in the new plan. You will automatically be disenrolled from Blue Retiree Rx Plus.
- To **change to a Medicare health plan**, enroll in the new plan. Depending on which type of plan you choose, you may automatically be disenrolled from Blue Retiree Rx Plus.
  - You will automatically be disenrolled from Blue Retiree Rx Plus if you enroll in any Medicare health plan that includes Part D prescription drug coverage. You will also automatically be disenrolled if you join a Medicare HMO or Medicare PPO, even if that plan does not include prescription drug coverage.
  - O If you choose a Private Fee-For-Service plan without Part D drug coverage, a Medicare Medical Savings Account plan, or a Medicare Cost Plan, you can enroll in that new plan and keep Blue Retiree Rx Plus for your drug coverage. Enrolling in one of these plan types will not automatically disenroll you from Blue Retiree Rx Plus. If you are enrolling in this plan type and want to leave our plan, you must ask to be disenrolled from Blue Retiree Rx Plus. To ask to be disenrolled, you must send us a written request or contact Medicare at 1-800-MEDICARE (1-800-633-4227), 24 hours a day, 7 days a week (TTY users should call 1-877-486-2048).
- To change to Original Medicare without a prescription drug plan, you must either:
  - Send us a written request to disenroll. Contact Customer Service if you need more information on how to do so.
  - $\circ$  or Contact **Medicare**, at 1-800-MEDICARE (1-800-633-4227), 24 hours a day, 7 days a week, and ask to be disenrolled. TTY users should call 1-877-486-2048.

## **SECTION 3 Deadline for Changing Plans**

If you want to change to a different prescription drug plan or to a Medicare health plan for next year, you can do it from **October 15 until December 7**. The change will take effect on January 1, 2023.

#### Are there other times of the year to make a change?

In certain situations, changes are also allowed at other times of the year. Examples include people with Medicaid, those who get "Extra Help" paying for their drugs, those who have or are leaving employer coverage, and those who move out of the service area.

If you recently moved into, currently live in, or just moved out of an institution (like a skilled nursing facility or long-term care hospital), you can change your Medicare coverage **at any time**. You can change to any other Medicare health plan (either with or without Medicare prescription drug coverage) or switch to Original Medicare (either with or without a separate Medicare prescription drug plan) at any time.

#### **SECTION 4 Programs That Offer Free Counseling about Medicare**

The State Health Insurance Assistance Program (SHIP) is a government program with trained counselors in every state. In South Carolina, the SHIP is called Insurance Counseling Assistance and Referrals for Elders (I-CARE).

I-CARE is independent (not connected with any insurance company or health plan). It is a state program that gets money from the Federal government to give **free** local health insurance counseling to people with Medicare. I-CARE counselors can help you with your Medicare questions or problems. They can help you understand your Medicare plan choices and answer questions about switching plans. You can call I-CARE at 803-734-9900 or 1-800-868-9095. You can learn more about I-CARE by visiting their website <a href="www.aging.sc.gov">www.aging.sc.gov</a>.

## **SECTION 5 Programs That Help Pay for Prescription Drugs**

You may qualify for help paying for prescription drugs.:

- "Extra Help" from Medicare. People with limited incomes may qualify for "Extra Help" to pay for their prescription drug costs. If you qualify, Medicare could pay up to 75% or more of your drug costs including monthly prescription drug premiums, annual deductibles, and coinsurance. Additionally, those who qualify will not have a coverage gap or late enrollment penalty. To see if you qualify, call:
  - 1-800-MEDICARE (1-800-633-4227). TTY users should call 1-877-486-2048, 24 hours a day/7 days a week;

- o The Social Security Office at 1-800-772-1213 between 8 am and 7 pm, Monday through Friday for a representative. Automated messages are available 24 hours a day. TTY users should call, 1-800-325-0778; or
- o Your State Medicaid Office (applications).
- Prescription Cost-sharing Assistance for Persons with HIV/AIDS. The AIDS Drug Assistance Program (ADAP) helps ensure that ADAP-eligible individuals living with HIV/AIDS have access to life-saving HIV medications. Individuals must meet certain criteria, including proof of State residence and HIV status, low income as defined by the State, and uninsured/under-insured status. Medicare Part D prescription drugs that are also covered by ADAP qualify for prescription cost-sharing assistance through the South Carolina AIDS Drug Assistance Program (administered by the South Carolina Department of Health and Environmental Control). For information on eligibility criteria, covered drugs, or how to enroll in the program, please call 1-800-856-9954.

#### **SECTION 6 Questions?**

#### Section 6.1 – Getting Help from Blue Retiree Rx Plus

Questions? We're here to help. Please call Customer Service at 1-888-645-6025. (TTY only, call 711.) We are available for phone calls 8 a.m. to 8 p.m., Eastern Time, Monday through Friday. Our automated phone system handles call received after 8 p.m. and on Saturdays, Sundays and holidays. From October 1 through March 31, we are available 8 a.m. to 8 p.m., Eastern Time, seven days a week. Calls to these numbers are free.

## Read your 2023 Evidence of Coverage (it has details about next year's benefits and costs)

This Annual Notice of Changes gives you a summary of changes in your benefits and costs for 2023. For details, look in the 2023 Evidence of Coverage for Blue Retiree Rx Plus. The Evidence of Coverage is the legal, detailed description of your plan benefits. It explains your rights and the rules you need to follow to get covered services and prescription drugs. A copy of the Evidence of Coverage is located on our website at <a href="https://www.scbluesmedadvantage.com">www.scbluesmedadvantage.com</a>. You may also call Customer Service to ask us to mail you an Evidence of Coverage.

#### Visit our Website

You can also visit our website at <a href="www.scbluesmedadvantage.com">www.scbluesmedadvantage.com</a>. As a reminder, our website has the most up-to-date information about our pharmacy network (Pharmacy Directory) and our list of covered drugs (Formulary/Drug List).

## **Section 6.2 – Getting Help from Medicare**

To get information directly from Medicare:

#### Call 1-800-MEDICARE (1-800-633-4227)

You can call 1-800-MEDICARE (1-800-633-4227), 24 hours a day, 7 days a week. TTY users should call 1-877-486-2048.

#### Visit the Medicare Website

Visit the Medicare website (<u>www.medicare.gov</u>). It has information about cost, coverage, and quality Star Ratings to help you compare Medicare prescription drug plans in your area. To view the information about plans, go to <u>www.medicare.gov/plan-compare.</u>

#### Read Medicare & You 2023

Read the *Medicare & You 2023* handbook. Every fall, this booklet is mailed to people with Medicare. It has a summary of Medicare benefits, rights and protections, and answers to the most frequently asked questions about Medicare. If you don't have a copy of this document, you can get it at the Medicare website (<a href="https://www.medicare.gov/Pubs/pdf/10050-medicare-and-you.pdf">https://www.medicare.gov/Pubs/pdf/10050-medicare-and-you.pdf</a>) or by calling 1-800-MEDICARE (1-800-633-4227), 24 hours a day, 7 days a week. TTY users should call 1-877-486-2048.

#### Multi-language Interpreter Services

**English:** We have free interpreter services to answer any questions you may have about our health or drug plan. To get an interpreter, just call us at [1-888-645-6025]. Someone who speaks English/Language can help you. This is a free service.

**Spanish:** Tenemos servicios de intérprete sin costo alguno para responder cualquier pregunta que pueda tener sobre nuestro plan de salud o medicamentos. Para hablar con un intérprete, por favor llame al 1-844-396-0183. Alguien que hable español le podrá ayudar. Este es un servicio gratuito.

Chinese Mandarin: 我们提供免费的翻译服务,帮助您解答关于健康或药物保险的任何疑问。如果您需要此翻译服务,请致电 1-844-396-0188。我们的中文工作人员很乐意帮助您。这是一项免费服务。

Chinese Cantonese: 您對我們的健康或藥物保險可能存有疑問,為此我們提供免費的翻譯 服務。如需翻譯服務,請致電 1-844-725-1516。我們講中文的人員將樂意為您提供幫助。這 是一項免費服務。

**Tagalog:** Mayroon kaming libreng serbisyo sa pagsasaling-wika upang masagot ang anumang mga katanungan ninyo hinggil sa aming planong pangkalusugan o panggamot. Upang makakuha ng tagasaling-wika, tawagan lamang kami sa 1-844-389-4839. Maaari kayong tulungan ng isang nakakapagsalita ng Tagalog. Ito ay libreng serbisyo.

**French:** Nous proposons des services gratuits d'interprétation pour répondre à toutes vos questions relatives à notre régime de santé ou d'assurance-médicaments. Pour accéder au service d'interprétation, il vous suffit de nous appeler au 1-844-396-0190. Un interlocuteur parlant Français pourra vous aider. Ce service est gratuit.

Vietnamese: Chúng tôi có dịch vụ thông dịch miễn phí để trả lời các câu hỏi về chương sức khỏe và chương trình thuốc men. Nếu quí vị cần thông dịch viên xin gọi 1-800-389-4838 sẽ có nhân viên nói tiếng Việt giúp đỡ quí vị. Đây là dịch vụ miễn phí.

**German:** Unser kostenloser Dolmetscherservice beantwortet Ihren Fragen zu unserem Gesundheits- und Arzneimittelplan. Unsere Dolmetscher erreichen Sie unter 1-844-396-0191. Man wird Ihnen dort auf Deutsch weiterhelfen. Dieser Service ist kostenlos.

Korean: 당사는 의료 보험 또는 약품 보험에 관한 질문에 답해 드리고자 무료 통역 서비스를 제공하고 있습니다. 통역 서비스를 이용하려면 전화 1-844-396-0187 번으로 문의해 주십시오. 한국어를 하는 담당자가 도와 드릴 것입니다. 이 서비스는 무료로 운영됩니다.

Russian: Если у вас возникнут вопросы относительно страхового или медикаментного плана, вы можете воспользоваться нашими бесплатными услугами переводчиков. Чтобы воспользоваться услугами переводчика, позвоните нам по телефону 1-844-389-4840. Вам окажет помощь сотрудник, который говорит по-русски. Данная услуга бесплатная.

إننا نقدم خدمات المترجم الفوري المجانية للإجابة عن أي أسئلة تتعلق بالصحة أو جدول الأدوية لدينا. للحصول على مترجم فوري، ليس عليك سوى الاتصال بنا على 0189-844-1 سيقوم شخص ما يتحدث العربية .بمساعدتك. هذه خدمة مجانية

Hindi: हमारे स्वास्थ्य या दवा की योजना के बारे में आपके किसी भी प्रश्न के जवाब देने के लिए हमारे पास मुफ्त दुभाषिया सेवाएँ उपलब्ध हैं. एक दुभाषिया प्राप्त करने के लिए, बस हमें [1-844-725-1519] पर फोन करें. कोई व्यक्ति जो हिन्दी बोलता है आपकी मदद कर सकता है. यह एक मुफ्त सेवा है.

**Italian:** È disponibile un servizio di interpretariato gratuito per rispondere a eventuali domande sul nostro piano sanitario e farmaceutico. Per un interprete, contattare il numero 1-844-396-0184. Un nostro incaricato che parla Italianovi fornirà l'assistenza necessaria. È un servizio gratuito.

**Portugués:** Dispomos de serviços de interpretação gratuitos para responder a qualquer questão que tenha acerca do nosso plano de saúde ou de medicação. Para obter um intérprete, contacte-nos através do número 1-844-396-0182. Irá encontrar alguém que fale o idioma Português para o ajudar. Este serviço é gratuito.

French Creole: Nou genyen sèvis entèprèt gratis pou reponn tout kesyon ou ta genyen konsènan plan medikal oswa dwòg nou an. Pou jwenn yon entèprèt, jis rele nou nan 1-844-398-6232. Yon moun ki pale Kreyòl kapab ede w. Sa a se yon sèvis ki gratis.

**Polish:** Umożliwiamy bezpłatne skorzystanie z usług tłumacza ustnego, który pomoże w uzyskaniu odpowiedzi na temat planu zdrowotnego lub dawkowania leków. Aby skorzystać z pomocy tłumacza znającego język polski, należy zadzwonić pod numer 1-844-396-0186. Ta usługa jest bezpłatna.

Japanese: 当社の健康 健康保険と薬品 処方薬プランに関するご質問にお答えするために、無料の通訳サービスがありますございます。通訳をご用命になるには、1-844-396-0185 にお電話ください。日本語を話す人 者 が支援いたします。これは無料のサービスです。



BlueCross BlueShield of South Carolina is an independent licensee of the Blue Cross and Blue Shield Association