From: Hanson, Alison T
To: FN-OMB-OIRA-Submission
Subject: 2012 Part D Reporting Requirements: Comments
Date: Tuesday, May 10, 2011 12:33:34 PM

I am responding to the 60 day comment period for the 2nd draft of the 2012 Part D reporting requirements. Below are my organizations comments, I apologize for the tardiness.

Thank you,

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Report No.	Name of Report	Comment
II.	Retail, Home Infusion, & LTC	We agree with the change to remove reporting of GeoAccess numbers.
IV.	Medication Therapy Management Programs	We would suggest removing elements P&Q . This information is very time consuming to collect and Q is also quite subjective and the data may not be as reflective or meaningful as it's meant to be.
IX.	Coverage Determinations	Elements C, F, I and L changed to include the word "made". We would recommend using "requested" or "processed" when either apply. These terms are more straightforward and reflective of what we are being asked to report than "made".
XI.	Long Term Care Utilization & Waste	The final rule pushed back the effective date to 1/1/2013. We strongly encourage CMS to push the updated report effective date to 1/1/2013 as well. If the requirements are not implemented we cannot report. We would recommend continuing the current 2011 reporting through 2012 and implement the proposed LTC Utilization & Waste Report on a parallel track with the requirements in the final rule for 1/1/2013.

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