From:	FN-OMB-OIRA-Submission
To:	Dooling, Bridget C.E.
Subject:	FW: Comments on the CMS Revised Draft CY 2012 Part D Reporting Requirements
Date:	Tuesday, May 10, 2011 10:20:00 AM

From: Michael_Needel@tufts-health.com [mailto:Michael_Needel@tufts-health.com]
Sent: Thursday, April 28, 2011 2:34 PM
To: FN-OMB-OIRA-Submission
Cc: Michael_Needel@tufts-health.com
Subject: Comments on the CMS Revised Draft CY 2012 Part D Reporting Requirements

Hello Candy and Dana,

Sorry for the late notice, but we would like to submit the following comment:

- In regards to the "Appropriate Dispensing Prescription Drug in LTC Facilities under PDPs and MA-PD Plans" provision in the ACA, the Final Rule indicates compliance is required by 1/1/13 for this provision, while the Part D draft reporting requirements indicate that compliance for reporting is required by 1/1/12. We respectfully request that the reporting requirement be delayed to meet the Final Rule implementation date of 1-1-13.

Thank you,
Mike Needel
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