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To: FN-OMB-OIRA-Submission
Cc: Brenda Stubblefield; Catherine Casilio; Kelly Verrall; Martin Burruano; Robert Tracy
Subject: Medicare Part D 2012 Reporting Requirements Comments (H3344, H3362)
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Comments on 2012 Part D Reporting Requirements

Section IV. Medication Therapy Management Programs -

The data elements are all reasonable with no significant changes. Would like to see the specifics, especially for:

H. Date of MTMP enrollment. Is using the date of the enrollment letter acceptable?
I. Date of MTMP opt-out, if applicable. Are there any restrictions on this date? Can it be after the date the CMR was offered or received?
K. Offered annual comprehensive medication review. Does this only count if it's after the Opt-out?
L. If offered, date of (initial) offer. Can this be the same as the date of enrollment? Can this be the same or before the date of opt-out?
M. Received annual comprehensive medication review (CMR). Must the CMR actually include the conversation with member or only the offer for that conversation?
Q. Number of changes to drug therapy made as a result of MTM interventions. Changes include dosage changes, therapeutic or generic substitutions, and discontinueation of therapy. Can this include changes made as a result of the conversation with the patient and not the prescriber, so this number could be higher than "P. Number of prescriber interventions"?

Section V. Prompt Payment by Part D Sponsors -

Previous reporting requirements technical specs listed criteria to determine what claims counted towards the reporting. For example, there were specific guidelines as to what to include if a claim was reversed before it was paid, if it was reversed after it was paid, etc. We would like to see these specifications once again clearly documented for 2012.

Section IX. Coverage Determinations and Exceptions -

Seeking more clarification/definition in the reporting requirements or technical specs as to what is included in each data element. For example, in the timely decision fields (elements D., G., J., M.), are we looking to include the number that were approved or denied within the time frames?

Thanks,
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