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To Whom It May Concern,

PerformRx is the Pharmacy Benefit Manager (PBM) for multiple MAPD and PDP plans nationwide. We produce the data for the following Medicare Part D Reporting Requirement sections:

- MTM
- Retail, Home Infusion, and Long Term Care pharmacy Access
- Coverage Determinations and Exceptions
- E-Prescribing
- LTC Utilization
- Fraud, Waste, and Abuse

We appreciate CMS's commitment to seek industry comments, and submit the following recommendations for consideration.

Recommendation	Lessons Learned
CMS should provide a memo communicating changes to the Technical Specifications Document.	<p>We have encountered that CMS has updated the technical specifications without announcing the change. The revision was posted in HPMS, but most PBMs do not have HPMS access.</p> <p>This resulted in us not being aware of the newest clarifications, which meant that the data we provided to our clients for CMS submission was based on an outdated version of the technical specifications.</p> <p>This was identified as a gap during the data validation process.</p> <p>Had CMS announced the change, we would have revised our reporting procedures in enough time to generate the most accurate data for our clients to submit to CMS.</p>

Recommendation	Lessons Learned
<p>Changes to the reporting requirements and technical specifications should be noted with red text.</p> <p>CMS should not penalize plans for requesting reopenings to the reporting window to correct reports based on revisions to the technical specifications.</p>	<p>CMS generally highlights changes when it releases revisions to other guidance manuals. This makes it easier to find and increases the likelihood of compliance.</p> <p>CMS issued the two most recent changes to the technical specifications without identifying the changes. This increased the time it took to evaluate the document and make the necessary operational changes to meet the revised requirements.</p>
<p>Changes to technical specifications should identify the effective date or if the guidance should be applied retrospectively. Otherwise, plans are not sure if they need to re-report previously reported data.</p>	<p>CMS did not identify the effective date or provide instructions for re-reporting data that was based on prior versions of the technical specification document.</p> <p>When CMS identifies the effective date of the additional specifications it will provide plans with appropriate direction. If CMS requires plans to request a reopening of the reporting window, then plans would be able to refer to changes to the technical specifications as a reason for reopening.</p>
<p>CMS should issue the technical specification revisions within enough time to allow plans to operationalize them.</p>	<p>We appreciate CMS's willingness to reissue the technical specifications when it receives information that warrants it. For example, on two occasions in 2010 and 2011, we identified gaps in the instructions for MTM reporting, and CMS revised the technical specifications to address them.</p> <p>At the same time, it takes considerable programming and man hours to change the coding for a given report. In many cases there are multiple subcontracted vendors involved in report development. We would appreciate it if CMS would consider providing plans the opportunity to revise reports during a given window of time (at least two months) to do so when the technical specification revisions are issued on or in less than two months prior to the reporting deadline(s).</p>

<b>Recommendation</b>	<b>Lessons Learned</b>
We recommend that CMS revise the technical specification document to be more in line with the data validation instruction materials provided to auditors.	<p>Data validation auditors hold plans accountable for certain data requirements identified in the data validation instructions that are not mentioned in either the Reporting Requirements or the Technical Specifications documents.</p> <p>While CMS may have the impression that the expectations identified in the data validation instructions are industry standard, failure to identify these expectations in the guidance CMS provides to plans presents an imbalance. It is not fair to hold plans accountable for unwritten rules.</p> <p>We agree with the instructions provided to the data validation auditors and encourage CMS to provide the same level of instruction to plans.</p>
CMS should provide the same level of reporting requirement training to plans that it provided to data validation auditors.	We took the training that CMS created for the data validation auditors and encourage CMS to provide the same level of instruction to plans, and in a similar format. Web-based instructions allows people who are not included on CMS's Part C and D user call list the opportunity to receive training. The training certificate also provides documented evidence of training.

Please contact me with questions regarding the above. Compliance is our first concern. We appreciate the opportunity to participate in the comment process.

Sincerely,

Michelle M. Juhanson  
Manager, Compliance, Integrity & Quality Assurance  
PerformRx  
215.937.4108  
[Michelle.juhanson@performrx.com](mailto:Michelle.juhanson@performrx.com)