From:	Melissa Banik
To:	FN-OMB-OIRA-Submission
Cc:	Bobbi Utt; Kim Hackenberg
Subject:	Comment Submission Re: Medicare Part C and Part D Reporting Requirements and Supporting Documents
Date:	Monday, May 09, 2011 4:48:22 PM

According to Page 16 of the '508_PtRptTecSpec_10 26 10.pdf' attachment - Update to the Technical Specifications for Part C MA Reporting - memo dated 10/26/10, provides the following direction regarding the Benefit Utilization Report:

> "Claims run out date - Example: If a plan sponsor submits bids in late May/early June, and they include data for claims paid through 03/31, the cut-off date for this report would be 06/30/10 for the 8/31/10 due date.
>
> Plans should tabulate their incurred claims as of 03/31/ (Bids) and 06/30 (Experience Reporting) of the year following each contract year."

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Comment: Would CMS consider allowing MA plan sponsors to use the same medical claims data for the Part C Benefit Utilization Report that were used for preparing their Medicare Bid? This would allow for consistency with the bid process. Also, it seems unlikely an additional 3 months of claims run-out has a significant enough impact on the Benefit Utilization Report to justify completely re-pulling the claims.

Thank you for the opportunity to comment.

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