From: Gunn-Morton, Dawn
To: FN-OMB-OIRA-Submission
Cc: Gunn-Morton, Dawn
Subject: Comments Draft 2 of the 2012 ReportReq -04282011.xls
Date: Friday, May 06, 2011 1:35:38 PM

Attached find comments from Aetna Inc.regarding LTC/Waste Reporting Proposed Changes. Thank you.

Comments for the Second Draft of the 2012 CMS Medicare Part D Reporting Requirements
Comment/Response From:

Contact Person's name:
Email: Phone

Section	Page #	Description of Issue or Question	Suggested Revision/Recommendation
XI. Long-Term Care (LTC) Utilization and Waste	20	CMS has added a waste component to the current Long Term Care Utilization CY 2012 Part D Reporting Requirements, which entails reporting information for unused drugs returned to the pharmacy. While Part D sponsors can amend their LTC pharmacy contracts to require LTC pharmacies to report this information, we are concerned that there is no NCPDP Standard created that will allow the entire industry to have an automated and efficient way report WASTE related information. Without this NCPDP approved Return to Stock standard, the industry may attempt to handle these reporting obligations through some type of manual mechanism (such as logs or websites), which would be costly, inefficient and prone to inaccuracies. We therefore recommend that the reporting elements be built into the NCPDP transaction in the same manner it was for electronic prescribing. While recognizing that developing new industry standards requires time, building the Return to Stock indicators into a new NCPDP Transaction Standard is necessary to ensure reporting consistency throughout the industry. When the waste component of this report measure is implemented, please confirm if the data in elements 2.a – 2.E.12 should be reported based on the drug costs and formulary status at the time the claim is adjudicated?	We recommend that section #2 of the LTC Utilization and Waste Reporting Requirements; “LTC Waste” be removed from the 2012 Reporting Requirements. All of the data elements within this section of the reporting requirements are dependent upon the new Shortened Day Supply ruling which is slated for implementation in CY2013. Currently, there are no industry standard or process to identify, track or report these values until the shortened Day Supply standards are implemented. We recommend that CMS continue to report the 2011 requirements for LTC Utilization until standards for the industry can be established. Until the waste standards can be implemented, we also recommend that the timeline of reporting LTC Utilization remain as is: YTD: January 1 – December 31 .

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