

PUBLIC SUBMISSION

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Docket: CMS-2014-0126
 (CMS-10538) Prior Authorization Form for Beneficiaries Enrolled in Hospice

Comment On: CMS-2014-0126-0002
 Agency Information Collection Activities; Proposals, Submissions, and Approvals

Document: CMS-2014-0126-DRAFT-0010
 DC

Submitter Information

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General Comment

The Hospice Association of America (HAA) is an affiliated organization of the National Association for Home Care & Hospice (NAHC), the nations largest association representing home health, home care, and hospice organizations. Our membership includes freestanding hospice organizations as well as hospices that are linked to home health agencies and to health systems. As such, we appreciate the opportunity to provide comment regarding the proposed Part D Prior Authorization Form for Beneficiaries Enrolled in Hospice CMS 10538 (OMB control number 0938-New). The following represent NAHC/HAA's comments on the proposed form.

We greatly appreciate that CMS is adopting a standardized form for use by hospices and Part D sponsors. The adoption of such a form is a step towards consistency in processes for hospices and sponsors and will help ease the burden of the prior authorization process on beneficiaries. It would be most helpful if clear instructions including all possible uses for the form accompanied the release of the form as well as having corresponding communication via an open door forum and other outlets to hospice providers, Part D sponsors and prescribers.

Again, we thank you for this opportunity to submit comments and appreciate CMS' effort to ease the prior authorization burden on beneficiaries. If you have any questions about these comments or other issues, please feel free to contact me at 202-547-7424 or at tmf@nahc.org.

Sincerely,
 Theresa M. Forster
 VP for Hospice Policy & Programs
 National Association for Home Care & Hospice