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General Comment

In the proposed CY 2016 Medicare Part D Reporting Requirements, Section I. Enrollment and Disenrollment CMS adds reporting on reinstatements. Plans, beginning in 2016, will begin processing good cause reinstatements rather than CMS. Up to this point, CMS has been processing good cause reinstatements rather than plans. As such, since the process itself is new, we respectfully request that CMS postpone the reporting of the reinstatements until CY 2017 to allow plans to become accustomed to the new responsibility. Especially given the fact that it will be then subject to data validation through the external audit process.

Specifically this would be removing the following reporting requirements for disenrollment:
 D. The total number of involuntary disenrollments for failure to pay plan premium in the specified time period.

E. Of the total reported in D, the number of disenrolled individuals who submitted a timely request for reinstatement for Good Cause.

F. Of the total reported in E, the number of favorable Good Cause determinations.

G. Of the total reported in F, the number of individuals reinstated.

Thank you for your consideration.