

PUBLIC SUBMISSION

As of: 11/27/15 10:06 AM Received: October 28, 2015 Status: Draft Tracking No. 1jz-8lxx-z39f Comments Due: November 23, 2015 Submission Type: Web
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Docket: CMS-2015-0107
 (CMS-R-262) Contract Year 2017 Plan Benefit Package (PBP) Software and Formulary Submission

Comment On: CMS-2015-0107-0001
 80 FR 57619 (60)

Document: CMS-2015-0107-DRAFT-0003
 WA

Submitter Information

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General Comment

PBP Section A

No comments. Agree with proposed change.

PBP Section D

No comments. Agree with proposed change.

PBP Section Rx

1, 2 and 3 - No comments. Agree with proposed change.

4. The Medicare Rx - Tier Models have been updated to more closely reflect the industry standard tier structure design.

We believe the 6 tier option outlined on the model form should also provide the option (as seen with the 5 tier options) to offer a "Non-Preferred Drugs" tier versus only being able to offer a "Non-Preferred Brand" Tier.

508 Compliance

No comments. Agree with proposed change.

CY 2017 Formulary Changes

1. CMS will collect a new supplemental file containing RxCUIs for the drugs not available at an extended day's supply under the Part D plan's benefit.

We would suggest that if the plan chooses to restrict extended day supplies at a tier level (i.e. all drugs on the Specialty Tier are not available at an extended day supply) that the plan NOT be required to submit a supplemental file and instead be able to designate this in the PBP and HPMS formulary module as applicable to the entire tier.

CY 2017 MTMP Changes

No comments. Agree with proposed change.

Additional comments on PBP and Formulary Submission Timeframes:

We would like to take this opportunity to suggest that for the 2017 BID submission, the timeframe for an 2017 FRF initial release and subsequent pre-bid deadline update be changed. Although it is helpful to have an FRF update available for 2017 filing purposes prior to the final bid deadline - for the purposes of bid calculations - it would be better to have the FRF update file released at least three weeks before the final bid submission due date in June. Thank you for your consideration of this request.