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General Comment

CMS-R-262 (OMB 0938-0763), 2017 Tier Labels and Hierarchy:

With regards to tier labels, we would recommend that plans be given the ability to label the tiers based on what is in the tier. For example: Currently we have some generics in the following tiers, but are limited to the descriptions provided- Tier 3, preferred brand and Tier 4 non-preferred brand. We believe accurate labels such as "Preferred Brand with some Generics" and "Non-Preferred Brand with some Generics" would better describe the contents of the tier to the member.