

PUBLIC SUBMISSION

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 (CMS-10142) Bid Pricing Tool (BPT) for Medicare Advantage (MA) Plans and Prescription Drug Plans (PDP)

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 CA

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General Comment

Comment regarding the CY 2017 Prior Authorization File Record Layout: Please consider increasing the maximum field length in the "Coverage_Duration" field to accommodate for the different length of therapy for novel Hepatitis C drugs (e.g., Harvoni, Sovaldi, etc.) that may vary depending on the past medical history, cirrhosis history, and genotype and requires at least 500 characters to describe.

Comment regarding the 2017 Tier Labels and Hierarchy: We support the proposed 2017 Tier Labels and Hierarchy changes to more closely reflect the industry standard tier structure design (specifically, provision of option F):

Option F:

Tier 1: Preferred Generic

Tier 2: Generic

Tier 3: Preferred Brand

Tier 4: Non-Preferred Drug

Tier 5: Specialty Tier

Tier 6: Optional*

*The optional 5th or 6th tier can be used as an excluded-drug-only tier or for other meaningful offerings such as a \$0