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General Comment

To Whom It May Concern:

Blue Cross Blue Shield of Michigan (BCBSM) and Blue Care Network (BCN) appreciate the opportunity to review and provide comments to the Centers for Medicare & Medicaid Services (CMS) on the CY 2017 Part D Reporting Requirements (OMB 0938-0992).

Section V (Improving Drug Utilization Review Controls): We are hoping CMS will consider eliminating the requirement to review and upload overutilization monitoring reports quarterly if the plan has implemented a hard edit at the point of service. With a hard edit at the point of service, plans end up reviewing opioid needs for every member that uses large amounts of opioids in "real time". Any beneficiary that shows up on the overutilization reports will have already been reviewed for appropriateness of opioid use and the overutilization report becomes duplicative.

Please let us know if you have any questions about our comment. Thank you in advance.