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To: Centers for Medicare and Medicaid Services
Submitted electronically via: www.regulations.gov

From: Shannon Schuster
UnitedHealthcare
UnitedHealth Group

Date: July 5, 2016

Re: *Medicare Part D Reporting Requirements and Supporting Regulations*

Attached are comments regarding CMS's request for information regarding Medicare Part D Reporting Requirements and Supporting Regulations (CMS-10185).

Medicare Part D Reporting Requirements and Supporting Regulations (CMS–10185)

Comments Submitted by UnitedHealthcare 7/5/2016

UnitedHealthcare (United) is pleased to provide the Centers for Medicare & Medicaid Services (CMS) comments regarding the request for information for Medicare Part D Reporting Requirements and Supporting Regulations.

Improving Drug Utilization Review Controls

United seeks clarity regarding the cumulative opioid MED edit under Improving Drug Utilization Review Controls reporting section. Under this section, data elements D and M state "If yes to element A [J], the pharmacy count criterion used, if applicable." United respectfully requests clarification on whether plans can report "N/A" if a pharmacy count was not part of the plan's criteria. Additionally, data element S states "Of the total reported in element O, the number of claims resolved and paid at the POS (either through a favorable decision through the coverage determination or appeals process, or other mechanism)." We ask that CMS also provide clarification on what may be considered an "other mechanism" under these reporting requirements.

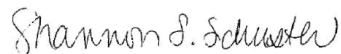
Coverage Determinations and Redeterminations

Reopenings

United also has a question regarding the Reopenings subsection of Coverage Determinations and Redeterminations. CMS has added "Other Error" and "Other" as potential data elements to be reported at the Contract level. We respectfully request that CMS provide further explanation as to the difference between "Other Error" and "Other" as well as examples of each.

If you have any questions on these comments, please feel free to contact me at 920-661-6217 or at shannon_s_schuster@uhc.com.

Respectfully,



Shannon Schuster
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UnitedHealthcare