

Anthem, Inc. Comments
 Medicare Part D Reporting Requirements and Supporting Regulations
 Federal Register Number: 2016-10705

Area(s)	Data Element	Current Proposal	Issue	Recommendation/Comments
Enrollment	Enrollment: 1P	The total number of individuals included in the advance notification for seamless conversion enrollment for effective dates occurring within the reporting period.	It appears as though this applies to pre-enrollment.	We recommend that CMS clarify that the instructions contained in section 1P under enrollment actually apply to pre-enrollment rather than enrollment.
	Enrollment: 1Q	Of the total reported in A, the number of individuals whose Medicare eligibility is based on age.	It is unclear about what CMS means by “whose Medicare eligibility is based on age,” as plans only have Date of Birth information and cannot know if eligibility is based on disability.	We recommend that CMS be more specific about what is meant by “eligibility based on age” since some individuals that enroll in an HMO plan may not be 65.
	Enrollment: 1R	Of the total reported in A, the number of individuals whose Medicare eligibility is based on disability.	It is unclear which group of individuals these instructions relate to.	We recommend that CMS indicate specifically which group/category of individuals these instructions relate to since the plan may not be aware of their disability or status at the advance notification period or at enrollment.
	Enrollment: 1S	Of the total reported in A, the number of enrollments submitted to CMS.	It is unclear which category/categories of individuals these instructions relate to.	We recommend that CMS provide additional information around these instructions so that it is clear which category/categories of individuals these instructions relate to. It is unclear if this proposal relates to actual members enrolled in both HMO and D-SNP plans.