

**From:** Diego Cano  
**To:** [OS OIRA \(HHS/OS\)](#)  
**Cc:** [Athena Patrikios](#)  
**Subject:** 30-day notice for the proposed 2017 Medicare Part D Reporting Requirements (CMS-10185; OMB control number: 0938-0992)  
**Date:** Tuesday, October 11, 2016 4:12:28 PM  
**Importance:** High

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Good afternoon,

Our business owners and delegated vendors (PBM) respectfully request that CMS consider reverting the due dates for CY2017 Part D reports to the original due dates, aligning with the CY2015 Reporting Requirements for Grievances, Medication Therapy Management (MTMP) and Retail, Home Infusion, LTC Pharmacy Access Reports (Part 1) ; which are end of February and end of May, respectively.

The additional time is requested because there are many steps required to pull accurate CMS reports (both internally and with external vendors) and the process requires extensive quality measures and reviews to allow for proper data pull and validation.

- Is there any viability in returning accelerated timelines to the end of May and February?
- If CMS does not change accelerated timelines, what is the reasoning for the accelerated CMS due dates?

We appreciate the opportunity to comment on the reporting requirements and CMS' consideration of our feedback. Thank you.

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