From: Randy Zumaya

To: OS OIRA (HHS/OS)

**Subject:** CMS-10185; OMB control number: 0938-0992 - Comment submission

**Date:** Wednesday, October 12, 2016 7:19:08 PM

Attachments: <u>image001.png</u>

Below are the comments for the proposed 2017 Medicare Part D Reporting Requirements - OMB control number: 0938-0992

We request that CMS revert back to the original due dates aligning with the 2015 Reporting Requirements for Grievances, Medication Therapy Management (MTMP) and Retail, Home Infusion, LTC Pharmacy Access Reports (Part 1); which are end of February the end of May, respectively. This is necessary as there are multiple steps required to pull accurate CMS reports (both internally and with external vendors). The process requires extensive quality measures to allow for proper data population and validation of CMS report data.

- 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.

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