

Shannon Schuster Director, Regulatory Affairs Government Programs UnitedHealthcare 3100 AMS Blvd Green Bay, WI 54313 920-661-6217

To: Centers for Medicare and Medicaid Services

Submitted electronically via: OIRA\_submission@omb.eop.gov

From: Shannon Schuster

UnitedHealth Group

Date: October 12, 2016

Re: Medicare Part D Reporting Requirements and Supporting Regulations

Attached are comments regarding the Medicare Part D Reporting Requirements and Supporting Regulations (CMS-10185).

## **Medicare Part D Reporting Requirements and Supporting Regulations**

## Comments Submitted by UnitedHealthcare 10/12/16

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

## **Coverage Determinations and Redeterminations** *Reopenings*

United has some concerns regarding the reopenings subsection. 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. We would also like to know the numeric value it will be assigned. Furthermore, we ask that CMS clarify if "Other Error" is a new and distinct reason code from "Other" as well as how each should be used. Finally, we ask that CMS clarify what numeric value it will be assigned.

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

Respectfully,

Shannon Schuster

Director, Regulatory Affairs

Shannon S. Schuster

UnitedHealthcare