

# PUBLIC SUBMISSION

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(CMS-10305) Medicare Part C and Part D Data Validation (42 CFR 422.516(g) and 423.514 (g))

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## General Comment

Improving Drug Utilization Review Controls: Implementation of a new reporting measure generally comes with numerous questions that arise during the reporting season. The interpretation by different carriers regarding the requirements and/or specifications will necessitate analysis and responses by CMS within the reporting timeframe. In addition, internal processes to gather, audit, format, and submit data to CMS involves development of complex, multi-functional data collection methods. Generally, these issues and processes take one reporting/audit season to address and perfect. The measure entitled "Improving Drug Utilization Review Controls" is a new reporting requirement and, currently, slated for audit during CY2017 MDV season. It is Priority Health's concern that interpretation issues will arise from the new reporting measure that require CMS responses within a short timeframe. Priority Health requests that CMS postpones the audit for this new measure until the CY2018 MDV season. This change will allow for the settlement of any interpretation issues prior to the audit occurring against the measure reported data.