

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

1. Is RTS a requirement for DUR reports? Should we be excluding claims from the summary that contain refill too soon errors? We have conflicting information as RTS isn't a requirement on the Part D Plan report Requirement/Technical Specifications, however it is mentioned in the Medicare Part C and Part D Reporting Requirements - Data Validation document. If RTS is a requirement, how are we supposed to know the reasonable overlapping fill date time for RTS edits?
2. We also see conflicting information regarding Drug(strength and dosage form) between the two documents. Strength and dosage form isn't a requirement on the Part D Plan report Requirement/Technical Specifications, however it is mentioned in the Medicare Part C and Part D Reporting Requirements - Data Validation document. Should strength and dosage form be included fields on the report?