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GA

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General Comment

Speeding up Part D data access benefits many stakeholders. The costs to requiring more frequent/accurate reporting are negligible when compared to the potential benefits of a more robust, up-to-date dataset of Part D activity. The cost of reporting the data should not drastically increase if required to report more than just once per year, if the reporting entities have the data structured properly. Once properly configured, the weekly/monthly submissions do not create a burden of time or money, and, if any cost is incurred, should be a one-time cost, as opposed to an ongoing cost.

The possibility of detecting and acting on fraud also increases when data is more up-to-date. When the data is only required to be submitted annually, a fraudulent use can go months before being detected and acted upon; however, weekly or at least monthly feedback loops would allow for detection and intervention much sooner.

Healthcare is an industry that, above and beyond other industries, has a moral obligation to be as transparent as possible. Sharing information has been proven more than anecdotally to not just save lives, but enhance them, and create a stronger, more capable healthcare system on which we all are forced, at some time or another, to rely. Please provide the necessary regulatory clarification required to keep the data from Part D from being dammed up for months at a time. Thank you.