

# PUBLIC SUBMISSION

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(CMS-10185) Medicare Part D Reporting Requirements and Supporting Regulations in MMA Title I, Part 423, §423.514

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(CMS-10185) Medicare Part D Reporting Requirements and Supporting Regulations in MMA Title I, Part 423, §423.514

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## General Comment

In Section VI. of the Reporting Requirements [Coverage Determinations and Redeterminations], we request that CMS clarify whether element A1 includes or excludes Withdrawn and Dismissed Coverage Determinations; and whether elements D1 through R1 include or exclude Withdrawn and Dismissed Coverage Determinations.

We would also recommend that CMS publish data validation calculations as part of the Medicare Part D Reporting Requirements.