

# Memo

To: Carolyn Leavitt, Office of Management and Budget  
From: Alice Lee-Martin, Division of Clinical and Economic Performance,  
MDBG, CBC  
CC: Bonnie Harkless, OSORA  
Date: February 6, 2021  
Re: Responses to public comments on CMS-10185, 2007 Part D Reporting  
Requirements

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In response to the Federal Register posting of document CMS-10185 2007 Part D Reporting Requirements, we received over 200 public comments by the August 15, 2006 deadline.

The comments can be tabulated as follows:

- 15 general comments to Part D reporting requirements
- 8 comments to Enrollment/Disenrollment reporting requirements
- 1 comment to Reversals reporting requirements
- 31 comments to Medication Therapy Management Programs reporting requirements
- 1 comment to Generic Dispensing Rate reporting requirements
- 18 comments to Grievances reporting requirements
- 7 comments to Pharmacy & Therapeutics (P&T) committee reporting requirements
- 16 comments to Transition reporting requirements
- 5 comments to Exceptions reporting requirements
- 25 comments to Appeals reporting requirements
- 34 comments to Call center reporting requirements
- 1 comment to Overpayment reporting requirements
- 2 comments to Pharmaceutical Manufacturer Rebates, Discounts and other Price Concessions reporting requirements
- 35 comments to Pharmaceutical Manufacturer Access/Performance Rebates Received By LTC Pharmacies reporting requirements
- 3 comments to Licensure & Solvency, Business Transactions, and Financial Requirements reporting requirements
- 7 comments to Drug Benefit Analyses reporting requirements

Comments received after August 15, 2006 were also reviewed, and found to be either duplicative to other comments received, or include requests for changes outside the scope of these reporting requirements.

Please see the attached document, Responses\_2007 Part D Reporting Requirements\_082006.doc, which provides a summary of comments and our responses. Additionally, please see the attached document, Final 2007 Medicare Part D Reporting Requirements\_revised082006.doc, which reflects changes made as a result of the comments received.

Please contact me at [Alice.Leemartin@cms.hhs.gov](mailto:Alice.Leemartin@cms.hhs.gov) or 410 786-1103 if you have any questions. Thank you for your assistance.