

#24

Comments on 2007 Part D Reporting Requirements

From VIVA Health, Inc. contract R0154
Contact: Libba Yates, (205) 358-7406

Section VI. Pharmacy & Therapeutics. Our plan delegates the P&T committee function to our PBM. Our PBM keeps the names of the P&T members in strict confidence to allow them to make objective decisions. In the past they've been allowed to provide committee membership information directly to CMS on behalf of the Part D plans they provide P&T for. We ask that this direct reporting by the PBM be allowed to continue.

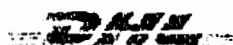
Section IX. On time to process standard redeterminations, should this be days rather than hours? The compliance timeframe is stated in days

Section X. Call Center Measures. Our PBM provides the pharmacy support line. This line is dedicated to Part D but not our particular plan. Therefore, we will only be able to report aggregate data for the Part D plans our PBM represents unless we require that a separate line be established for our plan only. To require this would increase costs for the PBM (and in turn us) and would make life harder on the already drowning pharmacists (would have to have a different # for each plan even if the plans utilize the same PBM). We ask that the Part D pharmacy line information be able to be reported at the Part D Plans level (versus our specific plan)

DHL: Track details

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Conti-



DHL USA Home



Track results detail

Tracking results detail for 56215934143

Tracking summary

Current Status: **Returned to shipper.**
 Returned on: 8/15/2006 11:31 AM
 Est. Delivery Date: 8/16/2006

Tracking history

Date and Time	Status	Location
0/20/2006 10:12 am	Returned to shipper.	Linthicum Heights, MD
8/15/2006 8:03 am	Arrived at DHL facility.	Linthicum Heights, MD
12:00 am	Transit through sort facility.	Wilmington, OH
8/15/2006 7:14 pm	Departing origin.	Birmingham, AL
4:49 pm	Picked Up by DHL.	Shipper's Door

Ship From:
 VIVA HEALTH
 Birmingham, AL 35205
 United States

Ship To:
 CMS
 Baltimore, MD 21244
 United States

Shipment Information:
 Ship date: 8/15/2006
 Pieces: 1
 Total weight: 1 lb 1
 Ship Type: Letter Extra
 Shipment Reference: R
 Service: Next Day
 Special Service:
 Description:

Attention:
 VIVA HEALTH

Attention:
 CMS

Tracking detail provided by DHL: 8/30/2006, 8:14:50 am ET

Track new

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FROM: VIVA HEALTH
1100 21st Place S
Birmingham AL 35205

TO: VIVA HEALTH
1100 21st Place S
Birmingham AL 35205

Product Label: 54426433546

Special Services:
 SAT HAA
 LAB

Delivery Address:
 1100 21st Place S
 Birmingham AL 35205

Origin Address:
 1100 21st Place S
 Birmingham AL 35205

Tracking Code: 54426433546

Delivery Times:
 Next Day: 10:30
 Next Day: 12:00
 Next Day: 3:00
 2nd Day

Barcode: 54426433546

Handwritten: NEED BARDINE

Reference: BASB6Z

DHL (400) PH

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Marie Gamble - RE: RE: Part D reporting comments

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From: Libba Yates
To: Bonnie (CMS/OSORA) Harkless
Date: 8/30/2006 2:52:20 PM
Subject: RE: RE: Part D reporting comments

I got the information from DHL and will fax it with our Part D reporting comments for your consideration now. Thanks!

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>>> "Harkless, Bonnie (CMS/OSORA)" <Bonnie.Harkless@cms.hhs.gov> 08/30/06 9:45 AM >>>
Please call me at the phone number provided below to further discuss.

Thanks

Bonnie L. Harkless
PRA Analyst
Office of Strategic Operations and Regulatory Affairs
Centers for Medicare and Medicaid Services
(410) 786-5666
Bonnie.Harkless@cms.hhs.gov

-----Original Message-----
From: R4H0164 (CMS contact)
Sent: Tuesday, August 29, 2006 2:59 PM
To: Harkless, Bonnie (CMS/OSORA)
Subject: Fwd: RE: Part D reporting comments

Melissa referred me to you. Any chance I can fax them?

-----Original Message-----
From: R4H0164 (CMS contact)
Sent: Tuesday, August 29, 2006 2:21 PM
To: Musotto, Melissa D. (CMS/OSORA)
Subject: RE: Part D reporting comments

I just got my comments returned to me by DHL. Handwritten on the side they put "need building". I used the address provided in the June 21st memo from Gary Bailey. I was just wondering if this happened to other plans and, if so, if CMS is making any accommodations. Could I fax you our comments?

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FAX



VIVA Health
1400 21st Place South
Birmingham, AL 35205
205-939-1718

To: Bunnic Harkless - CMS

410-786-3064
Fax

410-786-5666
Phone

From: Jibba Yates

205-558-7538
Fax

205-558-7406
Phone

Subject: Part D Reporting

Date: 8/30/06

Number of Pages -
(including cover page): 65

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