

Revisions from 30-day Comment Period to CY 2008 Part D Reporting Requirements

Summary:

- Compared to the second draft of the CY2008 reporting requirements posted for public comment, the final CY2008 reporting requirements document is associated with decreased reporting burden as a result of the changes made after the 30 day comment period.
- Specifically, the reporting level was raised from Plan (PBP) to Contract for two reporting sections (Section I - Retail, Home Infusion and Long-Term Care Pharmacy Access, Section II - Access to Extended Day Supplies at Retail Pharmacies), the frequency of reporting was decreased for one reporting section (Section II - Access to Extended Day Supplies at Retail Pharmacies), two reporting sections were deleted (Reversals and Home Infusion Utilization), and some data elements were clarified as being optional and not required (Section IV - Medication Therapy Management Programs).

Category	Section	Change/Reason	Effect to reporting burden
Response to public comments	Section I - Retail, Home Infusion, and Long-Term Care Pharmacy Access	Reporting level changed from Plan (PBP) to Contract, and various clarifications provided in introduction in response to comments. Type of data files changed from tab delimited to Excel due to program requirements.	Decrease
Response to public comments	Section II - Access to Extended Day Supplies at Retail Pharmacies	Reporting level changed from Plan (PBP) to Contract, and reporting changed from biannual reporting of 6 mo data to annual reporting of 3 mo data in response to comments and for consistency with Section I. Clarification provided regarding data as of the last day of the reporting period.	Decrease
Response to public comments	Section III - Vaccines	Data elements clarified in response to comments.	None
Lessons learned	Reversals	Section deleted as the reporting burden for these data is not justified for the information obtained for CMS' monitoring.	Decrease
Response to public comments	Home Infusion Utilization	Proposed section deleted due to comments, and as this information may be obtained from other data sources.	Decrease
Response to public comments	Section IV - Medication Therapy Management Programs	Some MTM data elements were revised from being required to being optional fields, and/or generally clarified as a result of public comments. Another data element entered in HPMS was revised to clarify that a zero value would be accepted.	Decrease
Lessons learned	Section XIII - Long-term Care	Exemption of collecting rebates from LTC pharmacies serving less than 5% of LTC beds in	None

Category	Section	Change/Reason	Effect to reporting burden
	Rebates	the area is clarified that the term pharmacy represents a pharmacy organization at its highest level rather than the discrete NCPDP number or location. This clarification is necessary for consistency in reporting.	