

Memo

To: Karen Matsuoka, Office of Management and Budget
From: Alice Lee-Martin, Division of Clinical and Operational Performance, MDBG, CPC
CC: Bonnie Harkless, OSORA
Date: February 2, 2009
Re: Non-material/non-substantive changes to Part D Reporting Requirements

It has been identified that three non-material and non-substantive changes need to be made to our currently approved Part D reporting requirements document, CMS-10185. An explanation for each change is listed below. In addition, a red-line document that identifies these change is provided. These changes do not increase, decrease, or otherwise change the burden associated with this data collection.

Reporting section	Current	New (Change)	Explanation
Part D Licensure and Solvency, Business Transactions and Financial Reporting Requirements	Subsection I: Sponsors mail hard copies of their financials and other required financial documentation.	Part D sponsors will submit financial statements as well as other required financial data electronically through the Fiscal Soundness Module located in HPMS. Within each data element, we have revised language to reflect this change.	Based on the integration of Parts C and D financial solvency reviews, these data need to be reported in the same HPMS module. The Fiscal Soundness Module in HPMS has been modified to accommodate Part D financial reporting.
	Subsection III, data element C) "Cash..."	Data element revised to state, "Cash from operations..."	Adding "from operations" clarifies the source of which cash should be reported.
	Subsection III, data element D) "Cash and cash equivalents..."	Data element revised to state, "Cash and short term investments..."	The terms cash and short-term investments are utilized in Statutory Accounting Principles; this method of reporting is consistent with that required by the state insurance departments. This change in terminology serves to clarify the data to be reported.

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