

INFORMATION NOT RELEASABLE TO THE PUBLIC UNLESS AUTHORIZED BY LAW:

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Comment Number	Entity Submitting Comments	Subject Matter	Summary of Comment	Accept/Deny Change
Substantive Comments				
General Information				
1	United	Part D Program Oversight	The past performance analysis is unfair to large organizations and to SNP plans.	Not Applicable (no change requested) - We appreciate the commenter's concerns, but the past performance methodology is outside the scope of the 2013 application PRA review. We are not considering comments on the methodology at this time.
Benefit Design				
2	United	MTM Attestations	Make the fact that "telehealth" includes telephone consultations explicit.	Deny - We specifically declined to define telehealth in the 2012 rule because the Office of the National Coordinator for Health Information Technology was charged with defining and overseeing telehealth standards. We believe that it is sufficiently clear that "telehealth" encompasses all telecommunications technologies, including the telephone.
Marketing/Beneficiary Communications				
3	United	Attestations	Requests that we clarify in attestation #4 which information must be provided annually and at time of enrollment and which need only be provided upon request.	Deny - Attestation #3 already lists the information that must be provided annually and at time of enrollment. Attestation #4 refers to the separate requirement that information be made available to beneficiaries at any time upon request.
Pharmacy Access Contracts				
4	Various I/T/U Entities	I/T/U Pharmacy Addendum	Commenters approve of the I/T/U addendum and encourage CMS CCIIO to use the addendum, or something similar, for the Health Insurance Exchanges.	Not Applicable (no change requested) - Thank you, but the Health Insurance Exchanges are outside the scope of the Part D Application.

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Clarification Comments (comments not on substantive information within the application; CMS will clarify directly with commenters)				