

30-Day PRA Comments on CY2017 Part D Reporting Requirements - CMS-10185

We received comments from 4 Part D sponsors; none were substantive or required changes to our data collection.

Three sponsors submitted similar requests for CMS to delay two sections' reporting deadlines, however as explained below, this is related to a change that was supported for 2016 Reporting Requirements to reduce the burden on sponsors' systems.

Reporting Section	Description of Issue or Question	Commenter's Recommendations	CMS Response
General	Request reporting deadlines as reverted to those in the 2015 Reporting Requirements, for the following sections: Grievances, Medication Therapy Management (MTM) and Retail, Home Infusion, LTC Pharmacy Access. If CMS does not, request CMS' reasoning for changed deadlines.	Revert to 2015's deadlines for the Grievances, Retail, Home Infusion, and Long-Term Care Pharmacy Access sections to be, or provide rationale for changes.	<p>CMS had changed reporting deadlines in the 2016 Reporting Requirements collection to avoid annual dates that may fall onto weekends, and also to offset the demands on both sponsors' and CMS' systems when all data were due on the same date.</p> <p>For 2017 reporting, MTM data will be collected using the same deadline as 2016 – that is, the last Monday of February. This is therefore similar to the 2015 deadline of 5/31.</p> <p>We will keep the deadline for Grievances as the first Monday of February, and for Retail, Home Infusion, LTC Pharmacy Access as the first Monday of May for 2017 Reporting. These deadlines are already in effect for 2016 Reporting, and are intended to help sponsors' workload to avoid multiple sections due at the same date. For example, Grievance data are due ahead of the data for Enrollment/Disenrollment, MTM, and Coverage Determinations and Redeterminations. These sections commonly require additional time for final decisions/updates to be accounted.</p>

<p>Coverage Determinations and Redeterminations</p>	<p>For the section Reopenings, clarify the addition of “Other Error” and “Other” as distinct data responses, and the numeric value to be assigned to each.</p>	<p>None</p>	<p>For the data element, “Reopening Reason,” a sponsor may report 1 of the following values:</p> <ul style="list-style-type: none"> • 1 for Clerical Error, • 2 for Other Error, • 3 for New and Material Evidence, • 4 for Fraud or Similar Fault. <p>“Other” is not listed as a possible value.</p>
<p>Grievances</p>	<p>Request clarification about the new data element of dismissed grievances.</p>	<p>Recommend CMS provide in the Part D Reporting Requirements Technical Specifications additional clarity to what information should be included, with examples.</p>	<p>CMS agrees and will provide additional technical clarifications on reporting the number of dismissed grievances.</p>