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Collection Requirements for Compendia for Determination of Medically-accepted Indications for Off-label Uses of Drugs and Biologicals in an Anti-cancer Chemotherapeutic Regimen (CMS-10302)

Comment On: CMS-2026-2180-0001
Collection Requirements for Compendia for Determination of Medically-accepted Indications for Off-label Uses of Drugs and Biologicals in an Anti-cancer Chemotherapeutic Regimen (CMS-10302)

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Submitter Information

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General Comment

CMS's estimate of 5.7 hours per response significantly undercounts the legal and administrative hours required for compendia publishers to thoroughly audit, verify, and publicly disclose financial conflicts of interest across multi-member oncology panels. Real-world panel auditing and verification require 15 to 25 hours per submission cycle.