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General Comment

Comment #1

The 2021 version of the Initial DMP Notice, Second DMP Notice, Alternate Second DMP Notice, and Sample Prescriber Inquiry Letter replaces "For More Information and Help with This Notice" with "Sincerely, [NAME AND CREDENTIAL OF CLINICAL STAFF]". Our question is whether this signature is intended to name the specific clinician who reviewed the case or whether a generic signature referencing the drug management program is acceptable? If the intention is to name the specific clinician, we have privacy concerns.

Comment #2

With expected changes to all Drug Management Program templates, there will be a significant work effort required for implementation. To successfully implement these changes and push them into production, we request 4-6 months between final rule and effective date.