

# PUBLIC SUBMISSION

<b>As of:</b> 4/15/20 7:49 AM <b>Received:</b> April 09, 2020 <b>Status:</b> Draft <b>Tracking No.</b> 1k4-9g1a-wqec <b>Comments Due:</b> April 27, 2020 <b>Submission Type:</b> Web
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**Docket:** CMS-2020-0021  
Medicare Part D Reporting Requirements (CMS-10185)

**Comment On:** CMS-2020-0021-0001  
Agency Information Collection Activities; Proposals, Submissions, and Approvals

**Document:** CMS-2020-0021-DRAFT-0002  
Comment on CMS-2020-0021-0001

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## Submitter Information

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## General Comment

Prime Therapeutics appreciates this opportunity to comment. After a comparison review between the current Part D Reporting Requirements and the proposed 2021 Part D Reporting Requirements, Prime submits the following MTMP question to CMS for clarification:

Since element F "Met the specified targeting criteria per CMS - Part D requirements. (Y (yes) or N (no))" is documenting all members who meet current MTM criteria as "Y" (not including opioid/at-risk beneficiary designations), should element K be marked as "Y" only for those MTM members who qualify as a part of the Drug management program at-risk beneficiary criteria and "N" for beneficiaries for whom "Y" is marked under element F?

Thank you.