

TO: Centers for Medicare and Medicaid Services (CMS)

FROM: OutcomesMTM, a Cardinal Health Company

SUBJECT: Comments regarding CMS-10185 Medicare Part D Reporting Requirements (OMB identification number: 0938-0992)

DATE: April 27, 2020

We appreciate the opportunity to comment on the Medicare Part D Reporting Requirements and would like to offer points of consideration and recommendation on the proposed requirements.

Section II. Medication Therapy Management Programs

- On page 8, data element F is defined as, Met the specified targeting criteria per CMS – Part D requirements. (Y (yes) or N (no)).”
 - **Comments:** OutcomesMTM requests clarity on the designation that should be selected for this element when a beneficiary qualifies for MTM services as a part the Drug Management Program. Should this designation be reserved for only beneficiaries that meet the current MTM criteria selected by the plan sponsor (not including at-risk beneficiaries identified via a Drug Management Program)?
- On page 8, data element K is defined as, “Targeting criteria met. Required if met the specified targeting criteria per CMS – Part D requirements in § 423.153(d)(2). (Multiple chronic diseases/multiple Part D drugs/cost threshold, or Drug management program at-risk beneficiary).”
 - **Comments:** OutcomesMTM requests clarity on the date that should be reported to CMS in an example where a beneficiary is identified as MTMP eligible via both the eligibility criteria utilized by the plan sponsor and at-risk beneficiary designation through the plan sponsor’s Drug Management Program.
- On page 9, data element AA is defined as, “Number of communications sent to beneficiary regarding safe disposal of medications. Required if met the specific targeting criteria per CMS – Part D requirements.”
 - **Comments:** OutcomesMTM asks that CMS clarify whether the information must be shared via a document or if a verbal conversation between the beneficiary and an MTM provider would count as a communication provided to the beneficiary for the purposes of Part D MTMP Annual Reporting.

Sincerely,



Dani Markus, PharmD, MBA
Vice President of Quality
OutcomesMTM



OutcomesMTM, a Cardinal Health company

Outcomes® Incorporated, doing business as OutcomesMTM, is the national leader in the design, delivery and administration of Medication Therapy Management (MTM) programs. Our team is committed to leveraging local relationships among pharmacists, patients and prescribers, along with innovative technology to help achieve optimal health outcomes. We administer more than 360 MTM programs for Medicare plan sponsors, Managed Medicaid organizations, commercial plans, pharmacy benefit managers and employer groups. MTM services in our programs are delivered and documented by our nationwide network of pharmacists and their support staff in retail pharmacies, physician clinics and long-term care organizations.

