

Comments for the 2nd Draft 2021 Medicare Part D Reporting Requirements				
Organization Name: CVS Health Organization Contact Name: Beth Ross Email Address: Elizabeth.Ross@CVSHealth.com Telephone Number: 214-695-5413				
Document Title	Page Numbers	Section Title	Specific Text from Document that is being commented upon	Comment
CY2021 Reporting Requirements	8 - 9	Section II. Medication Therapy Management Programs	<p>K.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, Drug management program at-risk beneficiary, Both)</p> <p>AA. Number of communications sent to beneficiary regarding safe disposal of medications. Required if met the specific targeting criteria per CMS – Part D requirements.</p>	<p>CMS has included reporting requirements for at risk beneficiaries (ARBs) referred to the Medication Therapy Management Program (MTMP) and provision of information on safe disposal of medications in the 2021 Medicare Part D Reporting Requirements published May 18, 2020. In the 2021 Final Rule, CMS noted that “CMS plans to make any provisions adopted in the subsequent, second final rule, although effective on or before January 1, 2021, applicable no earlier than January 1, 2022.”</p> <p>To date, a Final Rule providing the details for implementing these requirements has not been published. Because the referral of ARBs to the plan's MTMP and the provision of information on the safe disposal of medications will not be applicable until January 1, 2022 (for Plan Year 2022), we request that CMS remove these data elements from the Plan Year 2021 Medicare Part D Reporting Requirements.</p>
CY2021 Reporting Requirements	6	Section I. Enrollment and Disenrollment	L.Of the total reported in A, the number of enrollment transactions submitted usingthe Speacial Election Period (SEP) Election Period code "S" related toinvoluntary loss of creditable prescription drug coverage or lack of adequatenotification regarding the creditable status of drug coverage provided by an entityrequired to give such	We recommend correcting the spelling of the word "Special".
CY2021 Reporting Requirements	10	Section III. Grievances	<p>Sponsors should:</p> <ul style="list-style-type: none"> • Report data based on when the enrollee/appointed representative is notified (orally or written) of the the grievance decision. 	We recommend removing the extra instance of the word "the".

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CY2021 Reporting Requirements	10	Section III. Grievances	Sponsors should not: <ul style="list-style-type: none"> • Include CTM data when reporting grievances. • Report general inquiries or questions that do not include a complaint as grievances. • Include grievances filed by prosepective enrollees 	We recommend correcting the spelling of the word "prospective".
CY2021 Reporting Requirements	14	Section V. Coverage Determinations, Redeterminations, and Reopenings	Title 42, Part 423, Subpart U describes requirements for reopenings of coverage determiinations and redeterminations.	We recommend correcting the spelling of the word "determinations".