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As of today's date, the second final rule providing detailed information on how to implement and satisfy the new reporting requirements for the CY 2021 MTM program has not been provided (inclusion of At Risk Beneficiaries, and provision of safe disposal of medications). In addition, the most recent final rule indicated these changes will not be applicable until 1/1/2022. How should plans report on this data in 2021 without guidance on how to implement appropriately to meet regulatory requirements? How should plans report on data that is not applicable until the following program year?