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To: Centers for Medicare and Medicaid Services  
*Submitted electronically via:* <https://www.reginfo.gov/public/do/PRAMain>

From: Shannon Schuster  
UnitedHealthcare  
UnitedHealth Group

Date: June 29, 2020

Re: *Medicare Part D Reporting Requirements*

Attached are comments regarding the Medicare Part D Reporting Requirements (CMS-10185).

## Medicare Part D Reporting Requirements

Comments Submitted by  
UnitedHealthcare  
6/29/2020

UnitedHealthcare (UHC) appreciates this opportunity to provide input to the Centers for Medicare and Medicaid Services (CMS) regarding the Medicare Part D Reporting Requirements.

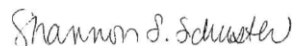
### Section II. Medication Therapy Management Programs

UHC opposes the updates to Element K and the addition of Element AA in the Medicare Part D Reporting Requirements, Section II. Medication Therapy Management Programs. CMS indicated in its recent final rule (CMS-4190-F, published in the Federal Register on June 2, 2020 at FR 33796-33911) that it would address requirements related to “Eligibility for Medication Therapy Management Programs (MTMPs) (§ 423.153) and Information on the Safe Disposal of Prescription Drugs” later in 2020 and that “any provisions adopted in the subsequent, second final rule, although effective on or before January 1, 2021, [would] be applicable no earlier than January 1, 2022.” Since these requirements are not yet finalized, we did not account for them in our 2021 MTMP submission and plans should not be expected to report on these items in 2021.

UHC urges CMS to remove proposed changes to Element K (pg. 8) – “...drug management program at-risk beneficiaries, Both” and also remove Element AA (pg. 9) – “Number of communications sent to beneficiary regarding safe disposal of medications. Required if met the specific targeting criteria per CMS – Part D requirements.” We recommend that CMS reintroduce these elements once they are finalized in rulemaking for the 2022 program year. CMS will also need to update the Health Plan Management System (HPMS) application template to include a selection for drug management program at-risk beneficiaries.

If you have any questions on these comments, please feel free to contact me at 920-661-6217.

Respectfully,



Shannon Schuster  
Director, Regulatory Affairs  
UnitedHealthcare