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Healthfirst requests that CMS remove the reporting requirements for ARB (at risk beneficiaries) referred to the Medication Therapy Management Program (MTMP) and the provision of information on safe disposal of medications from the 2021 Medicare Part D reporting requirements, published May 18th, 2020. CMS noted that they plan to adopt these provisions in the second final rule, applicable no earlier than January 1, 2022. As no Final Rule with implementation details has yet been published and will not be applicable until Plan Year 2022, we request removal of these data elements.