

TO: Centers for Medicare and Medicaid Services (CMS)

FROM: OutcomesMTM, a Cardinal Health Company

**SUBJECT: Comments regarding CMS-10396 Medication Therapy Management Program Improvements—
Standardized Format (OMB control number 0938-1154)**

DATE: April 24, 2020

We appreciate the opportunity to comment on the Standardized Format and would like to offer points of consideration and recommendations on several proposed modifications to the format.

General Comments

- OutcomesMTM asks that CMS include a style guide that can be utilized to generate the standardized format including, but not limited to: font type, font size, header and footer sizing and margins. This style guide should also include a template file in Word or OpenOffice format and an FAQ document, similar to that provided with the previous Standardized Format.
- Based on our experience, we recommend modifications to the template:
 - Include only one page for “My Notes and questions” at the end of the document to reduce patient confusion between two lists of notes and to reduce the burden of printing costs on MTM providers.
 - Include the “Prepared for” and “Prepared On” identifiers in the header rather than inserting that content into the body of the document. This will create a consistent format from page to page.

Page 2 (Cover Letter)

- We support removal of the salutation based on beneficiary feedback specific to diversity and inclusion safeguards and sensitivities.
- Please clarify if TTY is a required element of the Standardized Format.

Page 3 (Medication List)

- OutcomesMTM asks for clarity on the desired selection for the prescriber field when an over-the-counter medication is recorded. Previous guidance requires inserting “Self” within the prescriber field of an over-the-counter medication.
- We are supportive of the proposed changes to streamline the medication list and anticipate widespread positive provider and patient response to the proposed format of the Medication List.
- Please confirm that the “How I take it” portion of the Medication List would follow the same expectations as the “directions for use” section found in the Personal Medication List.
- OutcomesMTM recommends combining the sections titled “Allergies” and “Side effects to watch for.” Based on patient feedback, we do not believe beneficiaries would distinguish between the two sections. Additionally, the distinction between an allergy and sensitivity that leads to a side effect may be challenging for a beneficiary to discern. Lastly, the separation increases documentation burden for providers.



Page 6 (Recommended To-Do List)

- Inclusion of bulleted information within the “What I should do” portion of “My To-Do List” has the potential to create undue burden in the technical development of that formatting. OutcomesMTM recommends an approach that would allow for a non-bulleted formatting of this content.
- Please specify the desired content of the “My To-Do List” when no items are identified by the CMR provider.

Page 10 (Cover Letter) – Spanish Translation

- Grammar modification:
 - **Current:** Su Lista de Medicamentos le ayudará a monitorear sus medicamentos y saber cuando y como tomarlos.
 - **Recommendation:** 1.Su Lista de Medicamentos le ayudará a monitorear sus medicamentos y saber cuándo y cómo tomarlos.

Page 11 (Medication List) – Spanish Translation

- Grammar modification
 - **Current:** Como lo tomo | Por que lo tomo
 - **Recommendation:** Cómo lo tomo | Por qué lo tomo

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.

