Author Full Name: Charles Cutcliffe Received Date: 07/23/2021 01:46 PM

Comments Received:

Thank you for the opportunity to comment. We believe the new proposed DUR Reporting elements X, Y, BB and CC provide limited to no value in the reporting because currently there is no way for the pharmacist to distinguish an override for an exemption versus override for member being opioid naive because the pharmacist currently uses the same code for either override.