

TO: **Centers for Medicare and Medicaid Services (CMS)**

FROM: **OutcomesMTM, a Cardinal Health Company**

SUBJECT: Comments regarding CMS-10185 Medicare Part D Reporting Requirements (OMB identification number: 0938-0992)

DATE: July 23, 2021

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We appreciate the opportunity to comment on the Medicare Part D Reporting Requirements and would like to offer points of consideration and recommendation on the proposed requirements.

## **Section II. Medication Therapy Management Programs**

- On page 8, data element K is defined as, "Targeting criteria met. Required if met the specified targeting criteria per CMS – Part D requirements in § 423.153(d)(2). (Multiple chronic diseases/multiple Part D drugs/cost threshold; Drug management program at-risk beneficiary; Both; None)."
  - **Comments:** OutcomesMTM requests clarity on the date that should be reported to CMS in an example where a beneficiary is identified as MTMP eligible via both the eligibility criteria utilized by the plan sponsor and at-risk beneficiary designation through the plan sponsor's Drug Management Program. Like other requirements within Part D reporting, OutcomesMTM otherwise plans to report the earliest date of whichever targeting criteria eligibility is met first.
- On page 8, for data elements Y and Z, the reporting requirements reference communications "sent" to beneficiary.
  - **Comments:** OutcomesMTM asks that CMS clarify the definition of "sent" and if that includes hand delivery of MTM Program materials from the MTM service provider and/or returned mail.

Sincerely,



Dani Markus, PharmD, MBA  
Vice President of Product and Quality  
OutcomesMTM

## **OutcomesMTM, a Cardinal Health company**

Outcomes<sup>®</sup> 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.

