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Medical Therapy Management (MTM) Programs

- Appendix B – It appears a data element was removed (v) from the 2023 version and the data elements have shifted. The dependencies for specific areas shifted the data element label as well, but they seem to be off. For example, section 5d states it is counted if Data Element P is within the beneficiaries enrollment period, but it should data element Q. It appears when they shifted all elements and not only the elements that changed beyond element V. This occurs throughout this section
- Appendix J - 2.e / RSC-6.b - This isn't saying that the data used to determine if a member is eligible for MTM needs to be uploaded, is it?

Coverage Determinations and Redeterminations

- 2.e / RSC-5.a [Note] says that Data Elements 2.A - 2.F relate to Redeterminations, but it should be 2.A - 2.V.
- 2.e / RSC-10.I, RSC-11.c, RSC-12.b - These points seem to contradict each other regarding IRE. 10.I says exclude all (which matches CY2022), while 11.c says to include IREs. I can't see all of the data elements called out for 11.c, but if the pattern follows I think it's the same as 10.I. Furthermore, RSC-12.b again states to exclude IREs. So I think it's RSC-11.c that's out of whack.

Improving Drug Utilization Review Controls

- 2.c / RSC-3 Says that data is due to CMS by 02/28/2023, but it should be 02/27/2023.