



1275 Pennsylvania Ave NW, Suite 700

Washington, D.C., 20004

Submitted electronically via www.regulations.gov

April 2, 2024

The Honorable William N. Parham, III
Centers for Medicare & Medicaid Services
Director, Paperwork Reduction Staff
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Attention: Document Identifier/OMB Control Number: Room C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: Medicare Part D Reporting Requirements (CMS-10185)

Dear Director Parham:

Thank you for the opportunity to comment on the Department of Health and Human Services Centers for Medicare & Medicaid Services (CMS), proposed Part D Reporting Requirements, published pursuant to a Paperwork Reduction Act (PRA) Notice in the Federal Register on February 2, 2024.¹

CVS Health serves millions of people through our local presence, digital channels, and our nearly 300,000 dedicated colleagues – including more than 40,000 physicians, pharmacists, nurses, and nurse practitioners. Aetna, a CVS Health company offers Medicare Advantage Prescription Drug (MA-PD) plans in 46 states and D.C. Aetna also offers robust standalone prescription drug plans (PDPs) to individuals in all 50 states and D.C. Our unique healthcare model gives us an unparalleled insight into how health systems may be improved to help consumers navigate the healthcare system—as well as their personal healthcare—by eliminating disparities, improving access, lowering costs, and being a trusted partner for every meaningful moment of health. And we do it all with heart every day.

We have one comment with respect to the reporting requirements for Medication Therapy Management (MTM) Programs. Specifically, it is unclear why CMS removed the data element "J. Date met the specified targeting criteria per CMS – Part D requirements in § 423.153(d)(2). Required if met the specified targeting criteria per CMS – Part D requirements. (May be same as Date of MTM program enrollment)." We are concerned about the removal of this element because the targeted date is used in the MTM program Star ratings measure in that it affects how the denominator is calculated. If this element is no longer captured as part of the reporting requirements, we ask that CMS clarify

¹ 89 Fed. Reg. 7398 (February 2, 2024).



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whether this data element is still required to be used for the Star Ratings measure and, if not, that it issue a clarification regarding the calculation of the related Star Ratings measure.

Thank you for considering our comments. We welcome any follow-up questions you may have.

Sincerely,

A handwritten signature in black ink that appears to read "Melissa Schulman".

Melissa Schulman
Senior Vice President
Government & Public Affairs
CVS Health



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Appendix 1.

Specific Comments on the proposed Medicare Part D Reporting Requirements.