



December 16, 2016

CMS  
Office of Strategic Operations and Regulatory Affairs  
Division of Regulations Development,  
Room C4-26-05  
7500 Security Boulevard Baltimore  
Maryland 21244-1850

RE: Medication Therapy Management Program Improvements  
CMS-10396 / OMB control number 0938-1154  
Document Number: 2016-26246

We appreciate the opportunity to provide comments about the Medication Therapy Management Improvements – Standardized Format. Please see below our comments.

- a) Outside Consultation:
  - a. Stakeholders satisfaction with the standardized format should consider Puerto Rico Medicare beneficiaries, which could be different based on cultural considerations.
- b) PML and MAP:
  - a. Consider to merge MAP and Personal Medications list- It’s a little overwhelming for the patients and providers to receive so much information and our objective could be lost. In addition, it will contribute to paper work and mailing cost reduction for the Part D sponsor. This cost reduction could be utilized for patients care or clinical programs.

Sponsor Suggestion:

Patients Information:					Allergies: Bactrim		
Condition	Start Date	Medication	Dosage	Frequency	Prescriber	Stop Dates	*Recommendation
Diabetes	01-01-2016	Metformin	500mg	1 tablet, twice daily	Dr. Rivera	Ongoing	Observe for bloating or diarrhea
High Cholesterol	01-01-2016	Simvastatin	10mg	1 tablet, once daily	Dr. Rosado	Ongoing	Observe for muscle ache
*What we talked about/What I should do							



- c) Consider the possibility to include electronic notifications based on patients' preference.

In general, we understand that the standardized format includes too much information for the patient or the caregiver and the provider. We could be more assertive if we could provide targeted information in order to achieve and comply with our goals and CMS regulations centered in patients care.

Cordially,  
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