



Shannon Schuster
Director, Regulatory Affairs
Government Programs
UnitedHealthcare
3100 AMS Blvd
Green Bay, WI 54313
920-661-6217

To: Centers for Medicare and Medicaid Services
Submitted electronically via: regulations.gov

From: Shannon Schuster
UnitedHealthcare
UnitedHealth Group

Date: April 30, 2018

Re: *Medicare Part D Reporting Requirements and Supporting Regulations*

Attached are comments regarding the Medicare Part D Reporting Requirements and Supporting Regulations.

Medicare Part D Reporting Requirements and Supporting Regulations

Comments Submitted by
UnitedHealthcare
4/30/18

UnitedHealthcare (United) is pleased to provide the Centers for Medicare & Medicaid Services (CMS) comments regarding the Medicare Part D Reporting Requirements and Supporting Regulations.

United asks that CMS not finalize the following proposed element related to Medication Therapy Management (MTM): “H. Beneficiary in a long term care facility at the time of the first CMR offer? (Y (yes), N (no), or U (unknown))” because plans may not always be able to determine if the beneficiary is in a LTC facility at the time of the first CMR offer, particularly if the offer is sent via a letter to the beneficiary. In the alternative, United recommends that CMS align the wording of the long-term care facility data element H with the wording of the cognitive impairment data element and add “or delivery of CMR” to the end. This would allow plans more flexibility in how they report this information and minimize any burden in doing so.

If you have any questions on these comments, please feel free to contact me at 920-661-6217.

Respectfully,



Shannon Schuster
Director, Regulatory Affairs
UnitedHealthcare