

July 5, 2016

Andrew Slavitt, Acting Administrator
Centers for Medicare & Medicaid Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
Attention: CMS-10185
7500 Security Boulevard
Baltimore, MD 21244-1850

***Re: Medicare Part D Reporting Requirements and Supporting Regulations
(CMS-10185)***

Dear Acting Administrator Slavitt;

The Academy of Managed Care Pharmacy (AMCP) thanks the Centers for Medicare and Medicaid Services (CMS) for the opportunity to provide comments in support of the notice titled “*Medicare Part D Reporting Requirements and Supporting Regulations (CMS-10185)*” published in the Federal Register on May 6, 2016. Under the notice, Part D sponsors would be responsible for submitting Medication Therapy Management (MTM) program reports as described in Title I, Part 423, Subpart D, § 423.153 for CY2017 by the last Monday of February in 2018. AMCP supports the establishment of the MTM reporting deadline as the last Monday of February.

AMCP is a professional association of pharmacists and other practitioners who serve society by the application of sound medication management principles and strategies to improve health care for all. The Academy's 8,000 members develop and provide a diversified range of clinical, educational, medication and business management services and strategies on behalf of the more than 200 million Americans covered by a managed care pharmacy benefit.

AMCP notes that on May 27, 2016, CMS released the final CY2016 Part D Reporting Requirements and Technical Specifications.¹ As originally proposed, the MTM reporting deadline would have been changed

¹ Available at https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/Downloads/CY2016_Part-D-Reporting-Requirements-06092016.pdf. Accessed June 28, 2016.

from the last day of February 2017 to the first Monday of February 2017. AMCP's MTM Advisory Group raised concerns that the change in reporting deadline would require significant resource allocations for Part D sponsors and MTM vendors that may result in negative implications for patients. AMCP staff met with CMS staff in April 2016 to share the concerns of the MTM Advisory Group and request the reporting deadline remain at the end of February 2017. AMCP commends CMS for carefully considering the concerns of stakeholders and extending the CY2016 MTM reporting deadline to the last Monday of February 2017. AMCP believes the extension represents a workable compromise that allows CMS to alleviate stress on the HPMS system and also allows Part D sponsors and MTM vendors sufficient time to prepare the required reports without adversely impacting patient care. Therefore, AMCP is pleased to see CMS maintain the MTM reporting deadline as the last Monday of February for CY2017 and supports the deadline.

AMCP thanks CMS for its willingness to hear the concerns of its stakeholders and take action when in the best interest of patient care. AMCP looks forward to continuing to work on issues with CMS. If you have any questions regarding AMCP's comments or would like further information, please contact me at 703-683-8416 or scantrell@amcp.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Cantrell", with a long horizontal flourish extending to the right.

Susan A. Cantrell, RPh, CAE
Chief Executive Officer