



Via Electronic Submission to: partd_mtm@cms.hhs.gov
(Subject Line: CMR Summary Comments)

December 19, 2013

Cynthia G. Tudor, Ph.D.
Director, Medicare Drug Benefit and C & D Data Group
Department of Health & Human Services
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244-1850

**Re: Request for Comments – Standardized Format for Part D Medication
Therapy Management Program Comprehensive Medication Review Summary**

Dear Dr. Tudor:

On behalf of the membership of the Pharmacy Health Information Technology Collaborative, we are pleased to submit comments in response to the November 18, 2013, CMS letter *Request for Comments – Standardized Format for Part D Medication Therapy Management Program Comprehensive Medication Review Summary*.

The Pharmacy HIT Collaborative is supportive of the revisions proposed for the standardized format. We also are supportive of CMS including a technical expert panel of long-term care (LTC) stakeholders in this review process to optimize the integration and effectiveness of the standardized format in LTC settings.

The Pharmacy HIT Collaborative has been involved with CMS since the early development of the standardized format. We were pleased to see that CMS incorporated the majority of the Collaborative's August 2011 recommendations into the initial standardized format implementation and that those recommendations are remaining in the proposed revisions.

Upon reviewing the proposed revisions, we recommend that the following minor additions be made:

1. Cover Letter: Change the 2nd sentence, last paragraph:
From: I/We look forward to working with you and your doctors to help you stay healthy....

Pharmacy Health Information Technology Collaborative

| 401 Holland Lane Suite 702 | Alexandria, VA, 22314 | www.pharmacyHIT.org | 703-599-5051 |

To: I/We look forward to working with you, your doctors, and other health care providers in your team to help you stay healthy....

As patient-centered, health care providers, pharmacists in all practice settings work with more than just their patients' physicians. Pharmacists work with their patients' full health care teams, which include other health care providers. This suggested change also is consistent with the same language that CMS is adding throughout its proposed revisions.

2. Page 1 Standardized Format: Include the prescriber's phone number in the prescriber's field. We recommended this in our August 2011 comments. We believe it is vitally important that the patient and the patient's caregivers have access to contact information for all health care providers listed on the form to help ensure the patient's compliance and safety with regard to medication use.

The Pharmacy HIT Collaborative, including pharmacy professional associations, Medication Therapy Management (MTM) intermediaries, and the National Council for Prescription Drug Programs (NCPDP), are defining guidelines and standards related to the pharmacist's role in HIT. The Collaborative supports and works with these organizations to make certain data elements such as those in the standardized format form are populated from the "Pharmacist EHR" and other types of interoperable electronic systems.

Pharmacists in all practice settings provide several patient-centered services electronically. It is evident that access to Health IT solutions can enhance the pharmacist's ability to improve the overall medication-related safety and quality of patient care in coordination with other health care providers and improve patient outcomes.

Formed in the fall of 2010, the Pharmacy HIT Collaborative's vision and mission is for the US healthcare system to be supported by meaningful use of Health IT and the integration of pharmacists for the provision of quality patient care. In addition, to advocate and educate key stakeholders regarding the meaningful use of Health IT and the inclusion of pharmacists within a technology-enabled integrated health care system. The Collaborative's goals seeks to ensure HIT supports pharmacists in health care service delivery, achieve pharmacists' integration within health information exchange and support national quality initiatives enabled by Health IT.

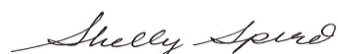
The Pharmacy HIT Collaborative's founding organizations represent pharmacists in all patient care settings and other facets of pharmacy, including pharmacy education and pharmacy education accreditation. The Collaborative's Associate Members represent e-prescribing networks, a standards development organization, transaction processing networks, pharmacy companies, system vendors and other organizations that support pharmacists' services. The Collaborative was founded by nine pharmacy professional associations

representing over 250,000 members and includes seven associate members from other pharmacy related organizations. For additional information, visit www.pharmacyhit.org

On behalf of the Pharmacy HIT Collaborative, thank you again for the opportunity to comment on *Request for Comments – Standardized Format for Part D Medication Therapy Management Program Comprehensive Medication Review Summary*.

For more information, contact Shelly Spiro, Executive Director, Pharmacy HIT Collaborative, at shelly@pharmacyhit.org.

Respectfully submitted,



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