



**Via Electronic Submission to:** [AdvanceNotice2017@cms.hhs.gov](mailto:AdvanceNotice2017@cms.hhs.gov)

March 4, 2016

Mr. Sean Cavanaugh  
Deputy Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
7500 Security Boulevard  
Baltimore, MD 21244-1850

**Re: Advance Notice of Methodological Changes for Calendar Year (CY) 2017 for Medicare Advantage (MA) Capitation Rates, Part C and Part D Payment Policies and 2017 Call Letter**

Dear Mr. Cavanaugh:

On behalf of the membership of the Pharmacy Health Information Technology Collaborative (Collaborative), we are pleased to submit comments for the *Advance Notice of Methodological Changes for Calendar Year (CY) 2017 for Medicare Advantage (MA) Capitation Rates, Part C and Part D Payment Policies and 2017 Call Letter*. Our comments pertain to the call letter's Part D Reporting Requirements for MTM.

The Collaborative has been working with several pharmacy organizations and other groups regarding the use of a structured coding system – SNOMED CT – for medication therapy management (MTM) services clinical documentation by pharmacists. Included among the organizations with whom the Collaborative has been actively working in this regard are the Pharmacy Quality Alliance (PQA), National Library of Medicine, and our members including the Academy of Managed Care Pharmacy (AMCP), the National Council for Prescription Drug Programs (NCPDP).

We believe that the consistent use of structured universal codes is critical to the expansion of documentation of MTM services and support the use and implementation of SNOMED CT codes for these services. The Collaborative has provided a way for prescription drug plans to request codes to map clinical terms to MTM SNOMED CT codes identified by the Collaborative. These MTM codes will be published on the National Library of Medicine's Value Set Authority Center (VSAC). The Collaborative encourages CMS to incorporate the use of SNOMED CT into the Part D reporting requirements for MTM.

Pharmacy Health Information Technology Collaborative

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SNOMED CT has been recognized as the leading clinical terminology standard used to document clinical care for many years. This terminology permits the capturing of clinical information and permits the codifying of patient care encounters in the electronic health record (EHR). Coupled with classification systems, such as ICD-10, incorporation of SNOMED CT leads to interoperability of health information systems.

One recently added group of terminology codes to SNOMED CT is the medication management category that includes MTM. SNOMED CT documentation for MTM services will allow pharmacists to document the clinical care that they provided. Encounter-based coding elements for MTM services include reasons or indications for the MTM visits and a description of the services that were provided (e.g., referral to MTM service, complications with medication therapy, comprehensive medication therapy review, targeted medication therapy review, medication-related action plan, pharmacist consultation with health care provider, patient education). Intervention-based coding elements for MTM services allow the pharmacist to document drug therapy problems identified during the medication regimen assessment, as well as provide the necessary SNOMED CT codes to document the patient's care plan or medication action plan.

Overall, SNOMED CT has the potential to create benefit for the patient and the greater health care environment, and again, the reason we encourage CMS to incorporate the use of MTM SNOMED CT codes into the Part D Reporting Requirements for MTM.

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The Pharmacy HIT Collaborative's vision and mission are to assure the nation's health care system is supported by meaningful use of HIT, the integration of pharmacists for the provision of quality patient care, and to advocate and educate key stakeholders regarding the meaningful use of HIT and the inclusion of pharmacists within a technology-enabled integrated health care system. The Collaborative was formed in the fall of 2010 by nine pharmacy professional associations, representing 250,000 members, and also includes associate members from other pharmacy-related organizations. 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 and health information networks, a standards development organization, transaction processing networks, pharmacy companies, system vendors and other organizations that support pharmacists' services. For additional information, visit [www.pharmacyhit.org](http://www.pharmacyhit.org).

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On behalf of the Pharmacy HIT Collaborative, thank you again for the opportunity to comment on the *Advance Notice of Methodological Changes for Calendar Year (CY) 2017 for*

*Medicare Advantage (MA) Capitation Rates, Part C and Part D Payment Policies and 2017 Call Letter.*

For more information, contact Shelly Spiro, Executive Director, Pharmacy HIT Collaborative, at [shelly@pharmacyhit.org](mailto:shelly@pharmacyhit.org).

Respectfully submitted,

A handwritten signature in cursive script that reads "Shelly Spiro".

Shelly Spiro  
Executive Director, Pharmacy HIT Collaborative

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