

[Name]

[Date]

Dear Oregon Board of Pharmacy Members,

I am writing to express my concern about the proposed rule changes to Medication Therapy Management. I [or organization] urge[s] you to reject changing the word “may” to “must” in proposed rule 855-115-0125 (2). It appears the Board voted to send these proposed changes to rulemaking for feedback from the public. However, the changes to the definition of MTM were not discussed in public comment during either the August or October Board of pharmacy meeting making the reasoning for the changes and thorough feedback difficult.

MTM encompasses a variety of services provided by pharmacists, generally for Medicare Part D plans which have their own definition. Changing the definition of MTM in this rule to require that “all elements listed be completed” is unnecessary and puts an undue burden on Oregon Pharmacists who complete MTM visits for Medicare recipients. Some Part D MTM interventions may be as simple and brief as a telephone call to determine why a patient is late for a maintenance medication refill or if an intervention or refill is needed. The proposed change would mandate the provision of services that are not indicated and increases the documentation and administrative burden of the pharmacist providing said service. This may in turn, entice Medicare plans to contract with pharmacists outside of Oregon (as they are not held to the same rules) to complete their yearly MTM visit instead of their local pharmacist who they see when filling their prescription medications. The Oregon Board of Pharmacy should be doing everything they can to develop and encourage the pharmacist-patient relationship which results in improved patient safety outcomes, not burden it with cumbersome mandates. **This proposed rule change from “may include” to “must include” is unnecessary.**

Thank you,

[Name], Oregon RPh