

JUSTICE IN AGING

FIGHTING SENIOR POVERTY THROUGH LAW

March 21, 2017

OMB, Office of Information and Regulatory Affairs,
Attention: CMS Desk Officer

Sent electronically via email to: OIRA_submission@omb.eop.gov

**Re: Medication Therapy Management Documents
Document Identifier: CMS-10396**

Justice in Aging appreciates the opportunity to comment on the above-referenced draft documents.

Justice in Aging is an advocacy organization with the mission of improving the lives of low income older adults. Justice in Aging uses the power of law to fight senior poverty by securing access to affordable health care, economic security and the courts for older adults with limited resources. We have decades of experience with Medicare and Medicaid, with a focus on the needs of low-income beneficiaries, including those dually eligible for both programs.

Our comments are brief.

First, we very much appreciate the efforts that have been made to use simple terminology and plain language construction. We hope that CMS will continue to revise all of its model documents and its own consumer communications to make them more understandable, particular to individuals with low literacy.

Second, in the “Keep this list up-to-date” box, we recommend that, in addition to using the term “herbals,” the form also include “supplements” either by saying “herbals and supplements” or by having an additional separate box for supplements. Some supplements do not fall neatly into the current listings and it is important to capture everything that the individual is using.

Third, we ask that CMS consider translating the document into additional languages beyond Spanish. The document is meant to engage consumers in management of their own medications so it is particularly important that limited English proficient consumers are comfortable with its content. It is a relatively simple form. The costs of translation into other languages would not be excessive but the benefits would be significant, particularly as part of CMS’s broader efforts to address health disparities.

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Thank you again for the opportunity to comment. If you need additional information, please do not hesitate to contact me at JGoldberg@justiceinaging.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Goldberg". The signature is fluid and cursive, with the first name "Jennifer" and last name "Goldberg" clearly distinguishable.

Jennifer Goldberg
Directing Attorney
Justice in Aging