RECOMMENDATIONS	PROPOSED ADVOCACY NEXT STEPS
Adopt GTMRx common definition of comprehensive medication management (CMM)	• Identify state and federal opportunities to incorporate definition e.g., Right Drug Dose Now Act, CMS Innovation Center (CMMI) models • Send letters signed by GTMRx membership to CMS and policymakers urging use of GTMRx definition • Create advocacy document that differentiates CMM from MTM and disease state management • Draft model letter that employers can use to encourage plan administrators to adopt CMM definition
Fee-for-service models: • **Allow physicians to bill for E/M services by clinical pharmacist**	Payment for Evaluation & Management (E/M) services ("Incident-to" billing) • Ensure proposed solutions via legislative fix that meets the needs of all stakeholders and GTMRx members • Develop advocacy document explaining need for fix • Sign-on letter for GTMRx members to express support • Joint participation in congressional meetings to encourage adoption of legislative and/or regulatory fix

Promote value-based models that encourage CMM & use of PGx as part of the CMM process of care	• Meet with CMMI to integrate CMM services within existing pilot structure to deploy a CMMI demo:
	    ○ in multiple census or Medicare regions, which includes a requirement that patients receive CMM
	    ○ that focuses on a specific disease cohort
	    ○ that is limited and focuses on a specific population that already requires increased resources and interventions
	• Develop evidence of CMM savings vs prior MTM models
	• Share CMMI plans with stakeholders
	• Pharmacogenomic (PGx) testing:
	    ○ Draft letter from CMS membership urging Medicare to establish a clear reimbursement structure for CMM as a process of care to include use of PGx (e.g., diagnostic, testing) and ensure MACs are consistent across country
	    ○ Draft legislation directing CMS to allow patients access to testing and CMM during diagnostic, screening & preventative services
	    ○ Create GTMRx education team to speak to payers at national/state meetings and conferences

Use attributable patient outcome measures for CMM	• Work with GTMRx members to identify, endorse and validate existing measures that evaluate CMM services • Develop partnerships with organizations like the National Council for Prescription Drug Programs (NCPDP) and National Quality Forum (NQF) to put together measures among various stakeholders
This work was developed from GTMRx's Payment and Policy Workgroup	