

DEPARTMENT OF HEALTH & HUMAN SERVICES  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, Maryland



**CENTER FOR MEDICARE**

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August 06, 2025

**Warning Letter**

Contract ID: H7262

Parent Organization Name: TRU Community Care

Legal Entity Name: TRU COMMUNITY CARE

Laura Salinas  
Medicare Compliance Officer  
2593 Park Lane  
Lafayette, CO 80026

VIA EMAIL: [LauraSalinas@trucare.org](mailto:LauraSalinas@trucare.org)

**RE: WARNING LETTER-FAILURE TO SUBMIT OVERUTILIZATION MONITORING  
SYSTEM RESPONSE FORM BY DEADLINE**

Dear Laura Salinas:

The Centers for Medicare & Medicaid Services (CMS) is issuing this warning letter to TRU COMMUNITY CARE, which operates Medicare Part D Contract ID H7262, for failing to provide a response to CMS through the Overutilization Monitoring System (OMS) within 30 days of receiving a report about a potential at-risk beneficiary (PARB). Your organization is receiving a warning letter because CMS previously issued a notice of non-compliance to your organization within the past year for its failure to submit an OMS response form (ORF) by the quarterly deadline.

Since January 2019, CMS has provided Part D contracts that operate a drug management program (DMP) with quarterly OMS reports of PARBs enrolled in that plan who meet the minimum OMS criteria [1]. These contracts receive a quarterly email notification announcing that their report package is available for download through the OMS on the Patient Safety Analysis Web Portal. As required in 42 CFR § 423.153(f)(15), sponsors must provide information to CMS within 30 days of receiving a report about a PARB from CMS. Sponsors must respond for each PARB identified by OMS using the ORF included in the downloadable Detail Overutilization Monitoring Report Package [2].

CMS is issuing this compliance notice to your organization because it failed to submit an ORF response by the below deadline(s):

**April 2025 (due 5/30/2025)**

Please be aware that this letter will be included in the record of your organization's past Medicare contract

performance, which CMS will consider as part of our review of any application for new or expanded Medicare contracts your organization may submit. CMS deems this instance of non-compliance a Part D issue. CMS notes that we are issuing this compliance notice based exclusively on information that we obtained from sources other than the sponsor's own self-disclosure.

In the future, please ensure that your organization submits the ORF within CMS' specified timeframes. For questions regarding OMS reporting and submission, please contact the Overutilization Monitoring System mailbox at [PartD\\_OM@cms.hhs.gov](mailto:PartD_OM@cms.hhs.gov). If you have questions related to the compliance implications of this notice, please contact Christine Hill at [Christine.Hill@cms.hhs.gov](mailto:Christine.Hill@cms.hhs.gov) and copy your account manager.

Sincerely,



Linda Anders, Division Director  
Division of Benefit Purchasing and Monitoring  
Medicare Drug Benefit and C&D Data Group

CC via email:

Rachael Whang, CMS  
Arianne Spaccarelli, CMS  
Christine Hill, CMS  
[PartD\\_OM@cms.hhs.gov](mailto:PartD_OM@cms.hhs.gov)

[1] The OMS criteria can be found in the CY 2019 Final Rule at 16452 (<https://www.gpo.gov/fdsys/pkg/FR-2018-04-16/pdf/2018-07179.pdf>).

[2] Technical guidance, including the ORF template, can be found on the CMS Part D Overutilization website at: (<https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/RxUtilization.html>)