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February 25, 2014

Ms. Marilyn Tavenner
Administrator
Centers for Medicare & Medicaid Services
The Hubert H. Humphrey Building
200 Independence Avenue S.W.
Washington D.C. 20201

Re: Notice of Proposed Rulemaking (NPRM) Medicare Program: Contract Year 2015 Policy and Technical Changes to the Medicare Advantage and the Medicare Prescription Drug Program

Dear Administrator Tavenner,

The Population Health Alliance (PHA), appreciates this opportunity to submit comments on the Centers for Medicare & Medicaid Services (CMS) January 10, 2014 NPRM entitled: *Medicare Program: Contract Year 2015 Policy and Technical Changes to the Medicare Advantage and the Medicare Prescription Drug Program*. We are very concerned that CMS' proposed requirements around preferred pharmacy networks and eligibility for Medication Therapy Management (MTM) will result in increased out-of-pocket costs, clinically inappropriate care, and reduced access to high-quality pharmacy networks for the 37 Million seniors enrolled in the Medicare Prescription Drug Program (Part D).

PHA convenes a broad range of stakeholders dedicated to enhancing the health of populations. Through advocacy, research, and education, PHA advances evidence-based population health management strategies. PHA aims to improve care quality and health outcomes while reducing preventable costs for the healthy and those at risk of or suffering from chronic conditions. Our diverse membership of more than 100 organizations and individuals includes physician groups, nurses, other health care professionals, hospital systems, wellness and prevention providers, population health management organizations, pharmaceutical manufacturers, pharmacies and pharmacy benefit managers, health information technology innovators, employers, researchers, and academics.

Preferred pharmacy networks and appropriate MTM are key components of population health management. Preferred networks offer seniors convenient access to safe and affordable prescriptions. In 2014, seniors opting for Part D plans with preferred pharmacy networks will have 61% lower monthly premiums than those in Part D plans without preferred networks.¹ Also, MTM helps seniors establish

¹ Avalere Health, "2014 Premiums and State Ratings for Medicare Part D Prescription Drug Plans with Preferred Pharmacy Networks," (December 2013).

and maintain appropriate medication routines to better manage chronic conditions, improve their health outcomes and reduce associated health care costs.²

Despite the popularity of preferred pharmacy networks among seniors, this proposed rule would require Part D plans to allow “any willing provider” to participate in a preferred pharmacy network. This will undermine Part D plans’ ability to provide high-value pharmacy benefits and result in a 21% increase in average monthly premiums for millions of Medicare beneficiaries.³ Some seniors will lose their chosen Part D plan altogether. Also, CMS proposed to determine MTM eligibility purely based on an individual’s number of chronic conditions, number of prescriptions, and prescription costs. However, these MTM eligibility requirements do not align with evidence-based clinical models that appropriately identify seniors who will benefit from these medication programs.

PHA strongly urges CMS to allow Part D plans to maintain current preferred pharmacy networks in order to provide seniors with convenient access to high-quality and affordable prescriptions. We also urge CMS to maintain flexibility around MTM eligibility and consult with industry stakeholders on clinically appropriate evidence-based standards for using MTM. PHA would be pleased to highlight evidence-based examples or details on the value of preferred pharmacy networks and appropriately used MTM programs. For inquiries, please feel free to contact Vicki Shepard at 202-525-9588 Vicki.shepard@healthways.com.

Sincerely,



Fred Goldstein
Interim Executive Director
Care Continuum Alliance d.b.a. Population Health Alliance

cc:

The Honorable Ron Wyden
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The Honorable Sandy Levin
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The Honorable Dave Camp
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² Bruce Stuart, F. Ellen Loh, Pamela Roberto et al., “Increasing Medicare Part D Enrollment In Medication Therapy Management Could Improve Health and Lower Costs,” Health Affairs, (July 2013).

³ Pharmaceutical Care Management Association (January 2014).