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May 7, 2019

The Honorable Frank Pallone
Chairman, Committee on Energy and
Commerce
United States House of Representatives
Washington, D.C. 20515

The Honorable Greg Walden
Ranking Member, Committee on Energy
and Commerce
United States House of Representatives
Washington, D.C. 20515

Dear Congressman Pallone and Congressman Walden,

On behalf of The American College of Clinical Pharmacy (ACCP), I am writing to thank you for holding the April 30, 2019 hearing into Prescription Drug Coverage in the Medicare Program. ACCP is committed to a patient-centered, team-based, and evidence-driven approach to medication use that aligns with emerging value-based pricing approaches to better ensure that the rational and economical use of medications is optimized for patients and for the health care system.

ACCP is a professional and scientific society that provides leadership, education, advocacy, and resources enabling clinical pharmacists to achieve excellence in patient care practice and research. ACCP's membership is composed of more than 17,000 clinical pharmacists, residents, fellows, students, scientists, educators and others who are committed to excellence in clinical pharmacy practice and evidence-based pharmacotherapy.

The burden of chronic health conditions has far reaching implications for long-term sustainability of the Medicare program. Over 68% of Medicare beneficiaries have two or more chronic conditions and over 36% have four or more chronic conditions. In terms of Medicare spending, beneficiaries with two or more chronic conditions account for 93% of Medicare spending, and those with four or more chronic conditions account for almost 75% of Medicare spending.

ACCP believes that in order to achieve a health care system that delivers better care, smarter spending, and healthier people and communities, it is vital to establish a truly team-based, patient-centered approach to health care consistent with evolving delivery and payment models currently delivered under private and commercial health plans.

According to your own data, over 60 million beneficiaries get their prescription drugs covered by Medicare. In 2016, prescription drugs covered under Medicare Part B and Part D accounted for nearly 20 percent (\$129 billion) of total Medicare spending. Given the central role that medications play in care and treatment of seniors, particularly those suffering from chronic conditions, combined with the continuing growth in the range, complexity and cost of medications -- and greater understanding of the genetic and physiologic differences in how people respond to their medications -- the current system consistently fails to deliver the full promise medications can offer.

Providing Leadership in Clinical Pharmacy Practice, Research and Education

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Michael S. Maddux, Pharm.D., FCCP, Executive Director

Comprehensive medication management (CMM) is a direct patient care service, provided by clinical pharmacists working as formal members of the patient's health care team that has been demonstrated to significantly improve clinical outcomes and enhance the safety of medication use by patients.

Beneficiary access to CMM services is increasingly available in Medicare Advantage (MA) plans as part of their efforts to drive innovation, improve quality and outcomes, and lower costs. Yet Medicare's current benefit structure lacks a team-based and patient-centered medication management service for the vast majority of beneficiaries. Although a very limited number of Medicare beneficiaries enrolled in Part D can access the "medication therapy management" (MTM) program, the services provided are delivered by Prescription Drug Plans (PDPs), not clinicians, and are entirely disconnected from patients' care teams. While ACCP believes that Part D MTM represents an important first step in recognizing that medication management services are an essential component of any drug coverage benefit, by structuring this program as an administrative – rather than medical – benefit, Part D MTM falls significantly short of its intended goals.

The team-based service of CMM is supported by the Patient Centered Primary Care Collaborative, (PCPCC), in which ACCP as well as the major primary care medical organizations are actively involved. CMM helps ensure that seniors' medication use is effectively coordinated, and in doing so enhances seniors' health care outcomes, contributing directly to Medicare's goals for quality and affordability. CMM can "get the medications right" as part of an overall effort to improve the quality and affordability of the services provided to Medicare beneficiaries.

In "getting the medications right," CMM also contributes to enhanced productivity for the entire health care team, allowing all team members to more fully focus on their own particular patient care responsibilities. By fully utilizing the qualified clinical pharmacist's skills and training to coordinate the medication use process as an interdependent team member, physicians and other team members are essentially freed to maintain focus on respective patient care activities that align with professional responsibilities as defined by scope of practice that reflect their particular area of expertise.

Medications are the fundamental treatment intervention in each of the eight most prevalent chronic conditions in Medicare patients. In addition, a significant number of the Merit-based Incentive Payment System (MIPS) performance measures established under the Medicare Access and CHIP Reauthorization Act (MACRA) directly relate to medication use. The CPC+ Program Year 2 Care Delivery Requirements administered by the CMS Innovation Center also includes access to CMM services for patients discharged from the hospital and those receiving longitudinal care management that would include the development of an individualized action plan addressing the patient's medication problem list, and a review of the plan with the primary care team.

As Congress continues to evaluate the long-term sustainability of the Medicare program and the effort of shifting Medicare payment policy for providers toward value of care and away from volume of services, ACCP urges you to assure inclusion of practices and programs that optimize the use of medications by America's seniors via CMM services. Provided under collaborative, patient-centered payment and delivery structures, these important services align exceedingly well with the purposes of MIPS and alternative payment model (APM) programs and facilitate the full inclusion of clinical pharmacists in team-based care structures, even in the situation where these clinicians are not currently recognized as MIPS-eligible providers themselves in current statute.

ACCP would also like to bring to your attention an important study currently underway examining the feasibility and scalability of implementing CMM in contemporary primary care medical practices. The study is being conducted by the University of North Carolina's Eshelman School of Pharmacy (UNC) in conjunction with the Alliance for Integrated Medication Management, the American Academy of Family Physicians National Research Network, and the University of Minnesota College of Pharmacy through a grant of more than \$2.4 million from ACCP and the ACCP Foundation.

Areas of ongoing work within the CMM grant include:

- Measuring the impact of CMM on clinical quality measures, health care costs, and the return on investment that can be realized from CMM
- Evaluating the role of a defined process of improvement cycles for scaling up the delivery of CMM services
- Developing, implementing, and validating a measure of fidelity to CMM
- Assessing provider perception of the value and influence of CMM on medical provider well-being in primary care settings
- Developing strategies for deploying resources to accelerate CMM implementation and practice improvement
- Assessing patient engagement and satisfaction with CMM services.

In summary, we thank you for your leadership in holding this hearing on the important issue of prescription drug payment policy under Medicare Part B and Part D. ACCP is dedicated to advancing a quality-focused, patient-centered, team-based improvement in health care delivery that (1) helps assure medication optimization, (2) enhances patient safety (3) promotes value-based rather than volume-based care to patients and (4) contributes to greater affordability and sustainability for the Medicare program. CMM is the foundation of that better approach.

We would welcome the opportunity to provide further information, data, and results from this important study, as well as connections with successful practices that provide CMM services. This would allow an enhanced and specific focus for efforts already underway within the Medicare program and across a variety of health systems nationwide to integrate CMM services into payment and delivery reform efforts that will modernize and sustain America's health care structures for the future.

Sincerely,

A handwritten signature in black ink, appearing to read "John Miles". The signature is written in a cursive, slightly slanted style.

Director, Government Affairs

Cc: Michael S. Maddux, Pharm.D. FCCP, Executive Director