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May 15, 2018

Adam Boehler
Deputy Administrator and Director
Center for Medicare & Medicaid Innovation
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Dear Director Boehler:

On behalf of the American College of Clinical Pharmacy (ACCP), I am writing to congratulate you on your appointment as director of the Centers for Medicare and Medicaid Innovation and as deputy administrator of the Centers for Medicare and Medicaid Services.

ACCP is a professional and scientific society representing almost 18,000 clinical pharmacists. We offer education, advocacy, and resources that enable our members to achieve excellence in clinical practice, research and education. We are the professional home for clinical pharmacy practitioners, scientists, educators, administrators, students, residents, and fellows from more than 60 countries. Together with our members, we are committed to excellence in clinical pharmacy and pharmacotherapy.

ACCP is committed to working with you to advance payment and service delivery models that aim to achieve better care for patients, better health for our communities, and lower costs through improvements to our health care system and primary care.

As part of your efforts to create and test innovative models, build collaborative networks and develop technology to support these activities, we urge you to explore efforts to integrate “comprehensive medication management” (CMM) into evolving Medicare delivery system and payment reforms.

Practiced by clinical pharmacists as part of interprofessional healthcare teams, CMM is a collaborative process of care that helps ensure medication use is effectively coordinated, achieves clinical goals, and enhances health care outcomes. In short, CMM helps “get the medications right” as part of an overall effort to improve the quality, effectiveness, and affordability of patient care.

CMM is a practice that is fully endorsed by the Patient-Centered Primary Care Collaborative and is rapidly emerging as the standard of care for integrated health care systems such as the Cleveland Clinic,

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the Geisinger Health System, the Mayo Clinic and others. It is also recognized within several federal programs like the Indian Health Service, many state Medicaid programs, and the Veterans Administration. It is facilitated and practiced under “collaborative practice agreements” with physicians and other health care providers that have been duly authorized in 49 states.

While Medicare still lacks effective incentives to support these CMM services for beneficiaries, we note with interest that CPC+ Program Year 2 Care Delivery Requirements 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. The CPC+ definition of CMM specialists includes pharmacists who have extensive experience with medications, medication therapy, and drug related adverse effects and have practiced in a team-based setting.

Through the application of their unique specialized knowledge and clinical experience in CMM practice, ACCP’s members are committed to helping patients achieve medication optimization. As the professional organization dedicated to advancing clinical pharmacist roles and responsibilities to optimize pharmacotherapy in the prevention and treatment of disease, ACCP would welcome the opportunity to work with you to explore efforts to integrate CMM as part of the Medicare payment and delivery system and reform process.

Thank you for your consideration of this critical issue. Like you, our goal is to make sure that our nation’s citizens have access to the highest quality healthcare available. We pledge to work with you toward that shared goal and stand ready to assist you in any way that we can.

Sincerely,



Director, Government Affairs

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