



July 29, 2024

Administrator Chiquita Brooks-LaSure
Centers for Medicare and Medicaid Services
200 Independence Avenue, SW
Washington, D.C., 20201

Dear Administrator Brooks-LaSure,

The Alliance for Long-Term Care Pharmacy at Home (the Alliance) is writing to thank you for your commitment to promoting access to long-term care (LTC) so that individuals may receive high-quality health care services while residing in their home or community. We are writing to request that you execute the authorities of the Centers for Medicare and Medicaid Services (CMS) as laid out under the Medicare statute, specifically the convenient access standard established under 42 U.S.C. §1395w-104(b)(1)(C)(i), to include beneficiary access to LTC pharmacy services in their home.

The Alliance is comprised of LTC pharmacies, professional associations, and care management groups working together to improve the lives of individuals with complex medical needs living in the community. By being available 24 hours a day, every day of the year, LTC pharmacies have for decades been designed to support medically complex patients by providing around-the-clock access, ensuring that people are on the right medications and at the right dose, providing special packaging, promoting adherence, consulting with family members and caregivers, delivering access to and administering vaccines, and much more.

However, there is a significant disparity in the level of support provided to Medicare beneficiaries living in the community who require LTC pharmacy at home services compared to those who reside in a skilled nursing facility. This is the case even though many in the community have the same level of care needs. In December 2021, [CMS](#) acknowledged that Part D enrollees requiring LTC pharmacy services can reside in various settings, including assisted living facilities and their homes. The agency also recognized that Part D prescription drug plans (PDPs) could pay higher reimbursement fees to pharmacies providing LTC pharmacy services to these beneficiaries, reflecting the additional costs that pharmacies incur when delivering such enhanced care. However, despite this guidance, most PDPs still do not provide adequate reimbursement for LTC pharmacy at home services, significantly impeding access to these specialized services for individuals residing at home. We urge CMS to utilize its existing authority to take action to address the complex needs of this vulnerable population.

In the United States, an average of \$500 billion is spent annually on preventable hospitalizations associated with adverse drug events, particularly for individuals living with disabilities and multiple chronic conditions.¹ For those living at home or in the community, accessing the sophisticated pharmacy care available in long-term care facilities—which can prevent hospitalizations and support safe community

¹ IQVIA (2020). Medicine Spending and Affordability in the U.S. Understanding Patients' Costs for Medicines. <https://www.iqvia.com/insights/the-iqvia-institute/reports/medicine-spending-and-affordability-in-the-us>.

living—is often challenging. As a growing number of beneficiaries with complex care needs choose to remain at home, the importance of expanding access to LTC pharmacy at home services increases. These specialized, and often lifesaving, services play a crucial role in reducing adverse drug events, decreasing emergency department visits, and managing costs, all while enabling beneficiaries to receive necessary care outside of a traditional facility setting.

We believe that CMS has the requisite legal authority to impose such requirements as outlined in our analysis (see Appendix 1) through the convenient access standard. We also believe this aligns with CMS’s strategic pillars to expand access and drive innovation. Therefore, we urge CMS to utilize this standard to require Medicare Advantage and Part D plans to expand access to LTC pharmacy at home service. We look forward to working with CMS to ensure that Medicare beneficiaries have access to these crucial services.

Sincerely,
The Alliance for Long Term Care Pharmacy at Home

