

Congress of the United States

Washington, DC 20515

August 15, 2024

Administrator Chiquita Brooks LaSure
Centers for Medicare and Medicaid Services
200 Independence Avenue, SW
Washington, DC, 20201

Dear Administrator Brooks-LaSure:

We are writing to request that you encourage beneficiary access to long term care pharmacy at home services in the Medicare program. We believe the Centers for Medicare and Medicaid Services (CMS) may use existing authority to ensure this vital benefit is available to Medicare beneficiaries. As you are aware, there is a significant gap in the level of support provided to Medicare beneficiaries living in the community who require LTC at home pharmacy services. This cohort is comprised of individuals who are more likely to be members of underserved communities, dually eligible for Medicare and Medicaid, and facing unique health challenges — including cognitive impairment and multiple chronic conditions.¹ We urge CMS to take action to address the needs of this vulnerable population.

In the United States, an average of \$500 billion is spent as the result of preventable hospitalizations associated with adverse drug events, particularly for individuals living with disabilities and multiple chronic conditions.² Yet, for those living in their home or the community, it often is difficult to access more sophisticated pharmacy care that is available in a long term care facility, which can prevent hospitalization and support safe community living. As a growing number of beneficiaries with complex care needs choose to remain in their home, the importance of expanding access to LTC at home pharmacy services increases. These specialized, and often lifesaving, services play a pivotal 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.

Existing reimbursement policies do not encourage delivering this level of care, which can create disparities in Medicare expenditures and access to appropriate care. Current total Medicare Part A and Part B spending is more than twice as high for community-dwelling beneficiaries requiring LTC services, as they are more likely to experience inpatient hospital admissions or emergency department visits. Additionally, Part D spending is also more than twice as high for this population because such beneficiaries average 14 prescriptions per year, significantly more than the average for facility-residing beneficiaries.³

CMS has acknowledged that Part D enrollees requiring LTC pharmacy services can reside in a variety of settings, including assisted living facilities and their home. The agency has also acknowledged that Part D Plans may pay higher reimbursement fees to pharmacies providing LTC pharmacy services to these beneficiaries — a recognition of the additional costs that pharmacies incur when delivering such enhanced care. However, despite

¹ ATI Advisory & Senior Care Pharmacy Coalition, Understanding the Long-Term Care Needs of the Medicare Population and the Role of Long-Term Care Pharmacies in Addressing this Need (July 2021) (the July 2021 ATI Report) (analyzing 2018 Medicare Current Beneficiary Survey data).

² 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>.

³ ATI Advisory & Senior Care Pharmacy Coalition, Expanding Long-Term Care Pharmacy in Home and Community-Based Settings: Understanding and Addressing the Barriers (November 2021).

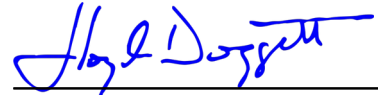
this guidance, most Part D plans still do not adequately provide LTC at home pharmacy services, which can impede access to these specialized services for individuals residing in home.

We urge you to utilize the convenient access standard, provided by Congress, to encourage Medicare Advantage and Part D plans to expand access to long term care pharmacy at home services. We look forward to working with you to address this challenge and appreciate your prompt action to ensure Medicare beneficiaries have access to this life-savings and life-enhancing set of services.

Sincerely,



Adrian Smith
Member of Congress



Lloyd Doggett
Member of Congress



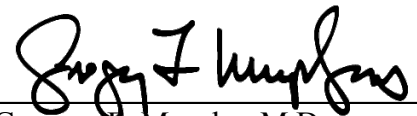
Nicole Malliotakis
Member of Congress



Terri A. Sewell
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Brian Fitzpatrick
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Gregory F. Murphy, M.D.
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