

December 17, 2024

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dear Administrator Brooks-LaSure,

On behalf of the undersigned organizations representing patients with long-term care (LTC) needs, we thank you for your commitment to improving care for home-based patients and promoting access to the necessary services to support their continued presence in our communities. As you continue to shape federal policies that support this mission, we urge you to recognize the critical role that pharmacy services play in enabling individuals to receive care in their preferred setting. Specifically, we request that you expand beneficiary access to LTC pharmacy services to their home. CMS currently possesses certain statutory authorities to mandate that Medicare Advantage and Part D plans provide appropriate reimbursement and support for LTC pharmacy services delivered to patients living at home who require an LTC level of care. Doing so would also align with CMS's broader goals of enhancing access and fostering innovation.

In recent years, there has been a significant shift, largely driven by patient's desires, toward LTC delivered in home and community-based settings that has transformed the way we care for seniors and individuals living with disabilities and multiple chronic conditions. The critical importance of making these services accessible to Medicare beneficiaries was further underscored by the COVID-19 pandemic – which only increased the demand for LTC at home. Central to the success of effective home-based care are LTC pharmacies. These specialized pharmacies are uniquely equipped to fill the needs of patients with complex medical conditions living in their homes and communities by being available 24 hours a day, seven days a week, and providing around-the-clock access to support. By being easily accessible and able to assist medically complex patients, LTC pharmacies ensure 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 more. In addition to enhancing patient health care outcomes, these specialized services contribute to significant cost savings by reducing

preventable hospitalizations and emergency room visits associated with adverse drug events, costing roughly \$500 billion each year in the United States.¹

Recognizing the vital contributions of LTC pharmacies, the Centers for Medicare and Medicaid Services (CMS) issued guidance in December 2021 expanding the settings in which LTC pharmacy services may reside and clarifying that increased dispensing fees for pharmacies providing LTC services in non-institutional settings, including patients' homes, are permissible under Medicare.² This guidance was a meaningful step toward acknowledging and supporting the comprehensive care needs of Medicare beneficiaries residing in the community.

Despite this progress, a significant disparity still exists in the level of support provided to Medicare beneficiaries living in the community who require LTC pharmacy services. Many Medicare Part D prescription drug plans (PDPs) have not adjusted their reimbursement structures to adequately support LTC pharmacy services delivered in home and community settings. As a result, patients with LTC needs living at home or in their communities face barriers accessing these critical services, even though their care needs are comparable to those residing in skilled nursing facilities. As the trend toward home-based care continues to grow, it is important, now more than ever, that CMS takes action to improve access to LTC pharmacy services for all Medicare beneficiaries with complex medical conditions, regardless of where they reside.

We strongly urge you to exercise your authority to close the gap in LTC and ensure that Medicare beneficiaries with complex medical conditions receive the high-quality, comprehensive pharmacy care they need to live safely and independently in their homes. We look forward to partnering with you to strengthen LTC pharmacy services and prioritizing patient-centered care.

Sincerely,

Alliance for Aging Research
Alliance for Women's Health and Prevention
ALS Association
American Geriatrics Society
Brain Injury Association of America
Cancer Support Community
Caregiver Action Network

¹ <https://www.iqvia.com/insights/the-iqvia-institute/reports-and-publications/reports/medicine-spending-and-affordability-in-the-us>

² <https://www.cms.gov/httpseditcmsgovresearch-statistics-data-and-systemscomputer-data-and-systemshpms-hpms-memos-archive/hpms-memos-wk-3-december-13-17>

Chronic Care Policy Alliance
Family Caregiver Alliance, National Center on Caregiving
Gerontological Society of America
Global Coalition on Aging Alliance for Health Innovation
GO2 for Lung Cancer
Healthy Men Inc.
HealthyWomen
Huntington's Disease Society of America
Lupus and Allied Diseases Association, Inc.
Muscular Dystrophy Association
National Alliance for Caregiving
National Association For Continence
National Association of Councils on Developmental Disabilities
National Caucus and Center on Black Aging
National Hispanic Medical Association
Nevada Chronic Care Collaborative
Partnership to Fight Chronic Disease
Prevent Blindness
RetireSafe
StopAfib.org
Triage Cancer