



September 13th, 2021

Chiquita Brooks-LaSure, Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attn: CMS-1751-P
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: Letter to CMS for Payment Mechanism for Medication Management Services through proposed Medicare Physician Fee Schedule (CMS-1751-P)

Dear Administrator Brooks-LaSure:

We are members of the [Get the Medications Right Institute \(GTMRx\)](#), a multi-stakeholder organization of over 1,400+ members and 900+ companies of payers, providers, and consumers committed to ensuring patients have access to appropriate and personalized use of medications and gene therapies to optimize outcomes and reduce costs (See Addendum A—GTMRx Membership List).

We believe that CMS's strong commitment to advancing value-based care (VBC) in Medicare for 61.7 million enrollees should be a continued focus and is urgently needed to more rapidly expand innovative payment models that will advance patient care services that will optimize medication use through [comprehensive medication management \(CMM\)](#) in practice for advanced primary care and specialty care to ensure better care, lower costs, and higher patient and provider satisfaction.¹ We urge CMS to move rapidly as practices moving toward VBC rely on alternative payment methodologies to drive provider transformation essential in the delivery of new and more effective services.

However, as we transition to VBC, we also urge the Centers for Medicare & Medicaid Services (CMS) to ensure that today's providers can fully engage all members of the healthcare team, including clinical pharmacists, in patient care. Specifically, we urge CMS to reverse a 2020 policy change limiting physicians to billing only the lowest-level evaluation and management (E/M) code for pharmacist-provided incident-to services, regardless of the duration and complexity of the E/M services provided.² This policy shift undermines health system care models that leverage care team members, including clinical pharmacists to support physicians, thereby threatening patient access to critical services, including comprehensive medication management (CMM). CMM is more rigorous in process and purpose, team-based, information-focused, and patient-centric than medication therapy management

¹ McFarland MS, Buck ML, Crannage E, Armistead LT, Ourth H, Finks SW, McClurg MR; writing on behalf of the Get the Medications Right Institute. Assessing the Impact of Comprehensive Medication Management on Achievement of the Quadruple Aim. *Am J Med.* 2021 Apr;134(4):456-461. doi: 10.1016/j.amjmed.2020.12.008. Epub 2021 Jan 17. PMID: 33472055.

² Centers for Medicare & Medicaid Services, Physician Fee Schedule CY 2021 Final Rule, 85 Fed. Reg. 84592-3 (Dec. 28, 2020), *available at* <https://www.govinfo.gov/content/pkg/FR-2020-12-28/pdf/2020-26815.pdf> (Limiting physicians supervising pharmacist-provided incident-to services to billing code 99211 for those services, despite the fact that many of the services provided by pharmacists meet the complexity and duration criteria set forth for code 99212-14).

(MTM), which is typically provided under Part D. CMM is an enhanced level of service that is provided through team-based care supported via collaborative practice agreements³ and/or credentialing, and privileging procedures to allow non-physician providers to be officially designated as members of the medical staff.

As an important member of the patient care team at hospitals, health systems, clinics, and physician practices across the nation, today's clinical pharmacists provide team-based care in both the inpatient and outpatient setting. Clinical pharmacists collaborate with physicians, nurses, and other healthcare professionals to ensure safe and effective medication use and improve patient health outcomes while reducing workload burdens on physicians and other clinical staff.^{4,5} Working in collaborative practice with physicians, they educate patients and their caregivers about medications, monitor drug therapy, and coordinate communication between patients, insurers, and interdisciplinary specialty providers.

Drug therapy is involved in 76% of physician office visits and is the sole treatment for many acute and chronic conditions. Problems associated with medication use, such as non-adherence, polypharmacy, errors and adverse events, result in 500,000 emergency room visits and 100,000 hospitalizations yearly, costing the health system over an estimated five billion dollars.⁶ Clinical pharmacists' management of medication therapy has been shown to improve transitions of care and reduce hospital readmissions.⁷

Unfortunately, the CMS E/M policy change significantly undervalues the critical role of clinical pharmacists in providing medication management services to Medicare beneficiaries. The CMS E/M policy change is fundamentally at odds with efforts to implement care models that include clinical pharmacists. Many commercial payers as well as states recognize and acknowledge pharmacists to be qualified health professionals (QHPs) whose services can be billed incident-to a physician using the higher-level E/M codes. The American Medical Association (AMA) CPT Code Book also recognizes pharmacists as QHPs eligible to "report services." Indeed, CMS issues National Provider Identifier numbers to pharmacists for just this reason. Pharmacists and pharmacies can bill using their NPI number for immunizations and pharmacists can bill Diabetic Self-Management Training (DSMT) and Medicare Diabetes Prevention Program services if they meet the requirements for these services.

CMS' policy preventing hospitals, health systems, clinics, and physician practices from billing for clinical pharmacist services provided incident to a physician service serves as an unnecessary barrier to broader adoption of innovative team-based care that enhances quality care for our patients. Nonoptimized medication use contributes to an estimated 275,689 deaths per year and cost \$528.4 billion annually.⁸ CMM, provided by an interprofessional team to include the clinical pharmacist, is an important tool to improve these outcomes.

³ Under collaborative practice agreements (CPAs), clinical pharmacists are able to add, modify, and discontinue medications; order lab tests; and monitor medication regimes.

⁴ McFarland MS, Nelson J, Ourth H, Groppi J and Morreale A. Optimizing the primary care clinical pharmacy specialist: Increasing patient access and quality of care within the Veterans Health Administration. *J Am Coll Clin Pharm.* 2020;3:494-500.

⁵ Funk K, Pestka D, McClurg MR, Carroll J, Sorensen T. Primary Care Providers Believe that Comprehensive Medication Management Improves their Work-Life. *Journal of American Board of Family Medicine.* 2019; 32(4): 462-473. doi: 10.3122/ jabfm.2019.04.180376.

⁶ Budnitz DS, Pollock DA, Weidenbach KN, et al. National surveillance of emergency department visits for outpatient adverse drug events. *JAMA.* 2006;296:1858-1866; *See also* Ni, W., Colayco, D., Hashimoto, J., Komoto, K., Gowda, C., Wearda, B., McCombs, J. Budget Impact Analysis of a Pharmacist Provided Transition of Care Program. *Journal of Managed Care & Specialty Pharmacy.* Feb 2018.

⁷ Budlong, H, Brummel, A, Rhodes, A, Nici, H. Impact of Comprehensive Medication Management on Hospital Readmission Rates. *Population Health Management* 2018. 21(5): 395-400.

⁸ Watanabe JH, McInnis T, Hirsch JD. Cost of Prescription Drug-Related Morbidity and Mortality. *Annals of Pharmacotherapy* 2018, Vol. 52(9) 829-837.

Reversing the 2020 E/M policy change and allowing hospitals, health systems, clinics, and physician practices to bill for the services provided by the clinical pharmacists on their care teams, incident to a physician, would help ensure our patients have access to the best possible medication management. Barring a full reversal of the policy change, we urge CMS to adopt either a clinical pharmacist modifier for existing E/M codes or a new clinical pharmacist-specific code set that corresponds to the higher-level E/M codes and accounts for the duration and complexity of pharmacist-provided incident-to services.

We look forward to working with you to implement regulations that allow hospitals, health systems, clinics, and physician practices to fully integrate and reimburse care team members providing CMM to optimize patient outcomes.

Sincerely,

Katherine Herring Capps
Co-Founder & Executive Director
GTMRx Institute
8230 Old Courthouse Road, Suite 420
Vienna, VA 22182
Office: 703-394-5398

CC:

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Deputy Administrator and Director of the Center for Medicare and Medicaid Innovation
The Hubert H. Humphery Building
Room 301H-02
Mail Stop: WB-06-05
200 Independence Ave., S.W.
Washington, DC 20001



Addendum A: GTMRx Membership List

Funding Board Members:

American College of Clinical Pharmacy (ACCP)
American Society of Health-System Pharmacists (ASHP)
Johnson and Johnson

Executive Members:

California Chronic Care Coalition (CCCC)
Kaiser Permanente
Tabula Rasa HealthCare
Veterans' Health Administration

Strategic Partners:

AACP	Coalition of State	Kimber Boothe
AbbVie	Rheumatology Organizations	LabCorp
AMGEN	(CSRO)	NAHCP
Association of Accessible Medications	Cureatr	OneOme
Avera Health	EmpiRx	PhactMI
Breast Cancer Index	Genentech	Teachers Retirement System of Kentucky
Cleveland Clinic	Genomind	
	Journal of Precision Medicine	

Employer Coalition Signing Members:

Dallas/Fort Worth Business Group on Health	Pittsburgh Business Group on Health
Florida Alliance for Healthcare Purchasers	Mid-America Coalition on Health Care
Florida Alliance for Healthcare Value	Midwest Business Group on Health
Great Philadelphia Business Coalition on Health	Nevada BGH/Nevada Health Partners
HealthCare 21 Business Coalition	Pacific Business Group on Health

Partial list our 1400+ Signing Members:

Abbvie(\$)	Association of Community Cancer Centers (ACCC)	Campbell's Pharmacy
Abington Jefferson Health	Atlantic Health System	Cantu's Pharmacy
Accenture	Atrium Health	Capacity Strategies
ActiveRADAR, Inc.	Auburn University, Harrison School of Pharmacy	Capita Consulting
Advanced Primary Care Strategies	Aurum Diagnostics, LLC	Capitol Advocacy & Government Affairs, LLC
Advocacy Options LLC	Avalon Behavioral Health Solutions, LLC	Capstone Healthcare Alliance
Advocate Medical Group and Midwestern University	Avera Health	Cardiomedix
AegisOne Rx	Avera Heart Hospital	Cardiovascular Services
Affinia Health Network	Avera Institute for Human Genetics	Care Accountability Inc.
Albany College of Pharmacy and Health Sciences	Avera McKennan Hospital	Caretuit
Aledade	Ballad Health	Carilion Giles Community Hospital
All In Solutions	Baptist Health	Catalyst Enterprises LLC
Allergy & Asthma Network	Baptist Health Louisville	Catholic Health Services of Long Island
Allergy Partners	Baptist Medical Center Jacksonville	CB Pharmacy Consulting, LLC
Alliance for Integrated Medication Management	Baylor University Medical Center	CCI consulting
American Academy of Family Physicians (AAFP)	Belmont University College of Pharmacy	CDC via IHRC
American Association of Colleges of Pharmacy (AACCP)(§)	Benefis Health System	CDPHP
American College of Clinical Pharmacy (ACCP)(†)	Beth Israel Lahey Health	Cedars-Sinai
American Society of Health-System Pharmacists (ASHP)(†)	BetterMyMeds	Centene
Ameshi Management Service Inc.	Beverly Hills Institute for Precision Medicine	Central Care & Anti-Aging Center for Medication Optimization
Amgen(\$)	Bingo Dynamic Lifesaver	Center for Quality Medication Management at the University of Florida
Anchor Medical	Biopharma Advisors	Chapman University School of Pharmacy
Antaeon	BJC Medical Group & ACO	CHC Health
Apexus	Blue Thorn Inc	CHESS Health Solutions
APhA	Board of Pharmacy Specialties	Chicago College of Pharmacy, Midwestern University
Apple Discount Drugs	Boston Medical Center	Children's of Alabama
APRx	Breast Cancer Index(\$)	Children's Health
Aramark	Brigham and Women's Hospital	Chiro To Go
Arcuris Consulting	BRKINS	CHRISTUS Health
ArdentCare Solutions	BT Pharmacy Consulting LLC	CHWP
Arine	Butler University, College of Pharmacy & Health Sciences	Cisco Systems, Inc.
Arxcel	California Chronic Care Coalition(*)	City Dermatology and Laser
AscellaHealth	California Society of Health System Pharmacists	Cleveland Clinic Main Campus
Ascension Medical Group	Carekinesis	Clinical and Translational Genome Research Institute of Southern California
Ascension Seton		University of Health Sciences

Clinical Pharmacy Systems
Inc
Collaborative Rx Outcomes
LLC
College of Pharmacy, Qatar
University
College of Psychiatric and
Neurologic Pharmacists
Colorado Pharmacists Society
Communication Prescription,
LLC
Community Health and
Wellness Partners
Community Health Network
Consana LLC
Consult A Pharmacist, LLC
Coriell Life Sciences
CPESN Iowa
CPS Telepharmacy
CrossBridge Health
CSS Health
CURA Strategies
Cureatr
Custom Design Benefits
CVS
CXJ Consulting
Dallas-Fort Worth Business
Group on Health
Davie's Community Hospital
DCH Health System
Deaconess Hospital
Department of Veterans
Affairs(*)
Desert Oasis Healthcare
Diamond S Ranch
Digital Health Space
Doylestown Health
Drake University
DRx Consulting LLC
Duke-Margolis Center for
Health Policy
Duke University Health
System
e.neves Consultoria
East Tennessee State
University Academic Health
Sciences Center / College of
Pharmacy
Eastern State Hospital

Eccrine Systems, Inc
eHealth Initiative
Elder Care Pharmacy
Consultants, LLC
Elite Pharmacy Consulting,
LLC
Elon University
Emerging Therapies
Solutions
Emerson Hospital
Employers' Advanced
Cooperative on Healthcare
Ensign Services
Entree Health
Envision Genomics
ePharma PBM do Brasil SA
Epic
Everyone Matters, Inc.
Excelicare
Executive Kings, Inc.
Executive Pharmacy
Consulting Services, Inc
Fairleigh Dickinson University
School of Pharmacy & Health
Sciences
Fairview Pharmacy Services
FAWKS Company
Federal Medical Centre,
Makurdi
Ferris State University COP
First Databank
First Impact
Florida Alliance for
Healthcare Value
Fortech
Franciscan Health
Fresenius Medical Care
Fronledge HC
Gateway Health Plan
Geisinger Health System
GenelQ
Genentech(\$)
Genet-Rx
Genome Creative
GenXys Health Care Systems
GeriatRx
Geritom Medical
Ghost Systems, Inc.
Global Health Care, LLC

Global Health Strategies
Gold Strike Findings
Grand Valley State
University, Physician
Assistant Studies
Greater Philadelphia
Business Coalition on Health
Gynecologic Care with Janice
Lyon MD SC
Great Plains QIN
Harding University College of
Pharmacy
Harps Food Stores, Inc.
Health Care Education and
Training, Inc.
Health Intelligence Partners
Health2 Resources
Healthcare 21 (H21)
Healthcare Quality Strategies
Inc.
HealthPartners Institute
HealthTeamWorks
Hematology-Oncology
Associates of CNY (HOA)
HG Pharmacist
HIE of One
High Point University
Highland Hospital
High Touch Health
Hillside Chronic Care
Management
Hinsdale Pharmacy
Associates, Inc.
Hinshaw & Associates
Houston Methodist Health
System
HVH Analytics
IBM Watson Health
Idaho State University
IDDI
i-Health
Illinois Pharmacists
Association
Illuminate Health
Independent Colleges and
Universities Benefits
Association, Inc.
Indiana University Health
Indian Health Service

Indian Pharmaceutical Association
inGENEious RX
Innovaccer
InnovaRx
Innovative Healthcare Consulting
Innovatix
InsightGx LLC
Inspira Health
INTEGRIS Medical Group
Invitae
Iowa Healthcare Collaborative
IPhA-PSMP
IPRO
Isetts Consulting, LLC
ITSAN – International Topical Steroid Awareness Network
IU Health
J&J(+)
Jerry H. Hodge School of Pharmacy Texas Tech University Health Sciences Center
JPS Health Network
Just Better Medicine Pharmacy Solutions
Kailos Genetics, Inc.
Kaiser Permanente(*)
Kaiser Permanente Colorado
Kelly Diabetes Associates, LLC
Kennedy Pharmacy Innovation Center, UofSC
College of Pharmacy
Kevin Marvin Consulting LLC
Labcorp(\$)
Laboratory Medicine and Pathology Advisors
Lantana Pharmacy
Larkin University College of Pharmacy
Laurel Senior Living Communities
Lipscomb University College of Pharmacy
Loma Linda University, School of Pharmacy

Lee Health
Luminus Diagnostics
Lehigh Valley Health Network
Main at Locust Pharmacy and Medical Supplies
Managed Healthcare Resources, Inc.
Manatee Memorial Hospital
Manchester University
Mann-Grandstaff Veterans Affairs Medical Center
Marie Savard, MD
Massachusetts College of Pharmacy and Health Science
Matheus BD Connections, LLC
MCG
McQuone Consulting
MD Resources
MedAllies
MedAware
MedCentre PLLC
Medical Risk Managers
Medication Call Reminder
MedicationXpert, corp.
Medigenics Consulting LLC
Medisafe
MediSync
Medplus Solutions
MedsPLUS Consulting
MedTek21 Solutions
MedWatchers
Mercer University College of Pharmacy
Mercy Health
Mercyone Waterloo Medical Center
Mid-America Coalition on Health Care
Midwest Business Group on Health
Midwestern University
Glendale College of Pharmacy
Missouri Pharmacogenomics Consulting
Mobile MediClaim, Inc.
ModRN Health

Monument Health, LLC
MorningStar Actuarial Consulting, LLC
Mountain Area Health Education Center
Mountain Health CO-OP
MyMeds
Nasr City Cancer Center
National Alliance of Healthcare Purchaser Coalitions(\$)
National Hemophilia Foundation
National Pharmaceutical Council
Navigant, Inc
Nebraska Medicine
Nevada Business Group on Health
New Directions Behavioral Health, LLC
New Directions Technology Consulting, LLC
NewHealth Collaborative;
Summa Health
New Jersey Poison Information and Education Services
Nokomis Fiduciary
Northeastern University School of Pharmacy
Northeast Ohio Medical University
Novant Health
Nurse Advocate
NYC Health + Hospitals/
Gotham Health
OCAPS
Ohio College of Clinical Pharmacy Advocacy Committee
Omicare
Omnicell
On Call Healthcare LLC
OneOme(\$)
OnlyYOU®
Options MD
Optum Health Services

Orange Regional Medical Center
OYES LLC
Pacific Business Group on Health
Pacific University Oregon School of Pharmacy
Palm Beach Atlantic University, School of Pharmacy
Panacea BioMatx, Inc
Park Nicollet Health Services
Parker Adventist Hospital
Partners Pharmacy
Penn Presbyterian Medical Center
Perfect Planet, LLC.
Pharma-Care, Inc.
Pharmaceutical Care Options, LLC
PharmaLead Consulting
Pharmazam, LLC
PharmD Live
PharmEcology Services, WMSS
PharMerica
Physician Health Partners
PIH Health Hospital – Downey
PipelineRx
Pittsburgh Business Group on Health
Point-of-Care Partners
Prefeitura Municipal de Belo Horizonte
Preventive Plus
Prisma Health
Proactive Health, Atrium
Psychopharm Solutions LLC
PTS Diagnostics
QRxConsults LLC
Quality Community Health Care
Quest Diagnostics(†)
QuickSTAT
Reed Family Pharmacy
Reengineering Cancer
Treatm

Regenstrief Center for Healthcare Engineering
Retirement Wellness Strategies
Rexall Pharmacy Group, Inc
RHA Health Services
Ritu Suri MD LLC
Riverside University Health System
RiverStone Health
Rochester Regional Health
Rocky Mountain Health Plans
Roosevelt University
Rosalind Franklin University
Roseman University
RPRD Diagnostics
Rutgers Pharmacy & Henry J. Austin Health Center
rx-Consultant, LLC
RxResults
Saba and Associates, LLC
Salt Lake City Medical Center
San Antonio Regional Hospital
Sanford Health
Santiam Hospital
Santosh Health
Sarasota Memorial Hospital
ScalaMed
SCAN Health Plan
Scipher Medicine
Scripta Insights
Signature Diabetes Institute (SDI)
Simplicity Pharmacy Services and Wellness Center Inc
Siouxland Community Health Center
SOHO Health
South College School of Pharmacy
South Dakota State University
Southwest General
Southwest Montana Community Health Center
Spartanburg Regional Healthcare System
St. Bernards Hospital, Inc.

St. Christopher's Hospital for Children
St. Johns University, Long Island University
St. Louis College of Pharmacy
St. Luke's Rehabilitation Institute
St. Mary Medical Center
Steward Healthcare
Stroke Association Support Network – Ghana
SyneRxgy Consulting, LLC
Tabula Rasa Health Care(*)
Teachers' Retirement System of Kentucky(\$)
TeleMedik
Texas A&M Rural and Community Health Institute
Texas A&M University HSC College of Medicine, A&M Rural and Community Health Institute
Texas Business Group on Health
Texas Tech University Health Sciences Center Jerry H. Hodge School of Pharmacy
TFG Partners, LLC
The FIT PharmD
The John Hopkins Hospital
The Johns Hopkins Health System
The Journal of Precision Medicine(\$)
The Kimber Boothe Group, LLC(\$)
The Sab Group
The Virtual Nephrologist, INC.
Therapy in your home – OT
PT ST
Thermo Fisher Scientific
TLJ Health
TMAccelerator
Towncrest Pharmacy
Tria Health
Trinity Clinical Pharmacy Services

TriStar Summit Medical Center
TrustCare Health
TS Consulting Services
Umm Al-Qura University
UNC Eshelman School of Pharmacy, Center for Medication Optimization
UnitedHealthcare
Universidade Federal de Minas Gerais
University at Buffalo
University of California Irvine
University of California San Diego
University of California San Francisco
University of Chicago Medicine
University of Cincinnati College of Pharmacy
University of Colorado
University of Connecticut School of Pharmacy
University of Florida College of Pharmacy
University of Georgia College of Pharmacy
University of Hawaii at Hilo; Hawaii Island Family Health Center
University of Illinois at Chicago College of Pharmacy
University of Iowa Hospitals & Clinics
University of Jordan Hospital
University of Kansas
University of Kentucky
University of Maryland
University of Maryland Quality Care Network

University of Medicine Mandalay
University of Minnesota
University of Mississippi School of Pharmacy
University of Missouri Kansas City School of Pharmacy
University of Nevada School of Medicine
University of New Mexico College of Pharmacy
University of North Texas Health Science Center
University of Rochester Medical Center
University of South Australia
University of South Carolina
University of Texas at Austin College of Pharmacy, Pharmacotherapy Division
University of Texas Rio Grande Valley
University of Utah College of Pharmacy
University of Tennessee Health Science Center College of Pharmacy
UPMC Western Maryland University School of Pharmacy
Uptown Pharmacy
USAID
UTHealth McGovern Medical School
VA Medical Center
Vanderbilt University Medical Center
Vigilance Health Inc.
Vintage Consulting
Virginia Commonwealth University

Visante, Inc
Vizient
Vulcan Enterprises LLC
Walgreens
Walmart
WardRx Consulting
Washington State University College of Pharmacy & Pharmaceutical Sciences
Watermark Counseling LLC
Watson International Consulting LLC
Wayne State University College of Pharmacy
Webster & Associates, LLC
WellScriptEd Consulting Inc.
WellWaze, Inc.
Wentworth-Douglas Hospital
Wesley Healthcare Systems
West Coast University
Western University of Health Sciences, College of Pharmacy
WeWa.life LLC
Wilkes University
William Carey University School of Pharmacy
William Jones RPh, LLC
Williamsburg Endocrinology, Inc
WilsonValue Drug Store
Wolfe's Pharmacy
Wolters Kluwer Health
W Triplett Consulting LLC
Xavier University of Louisiana College of Pharmacy
Xeris Pharmaceuticals
YouScript
Zigna Analytics
Züp Medical Services