

November 16, 2022

Elizabeth Fowler, PhD, JD
Deputy Administrator and Director
Center for Medicare & Medicaid Innovation 2810 Lord Baltimore Drive
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Dear Deputy Administrator Fowler:

On behalf of the Get the Medications Right (GTMRx) Institute and its members, we thank you for your work to implement the President's recent Executive Order (EO) on Lowering Prescription Drug Costs for Americans. We are pleased that the Administration is taking immediate action to implement parts of the Inflation Reduction Act of 2022, which will benefit Medicare beneficiaries with a cap for out-of-pocket costs at the pharmacy and for insulin. Combining these changes with comprehensive medication management services could further reduce unnecessary spending, while increasing care quality. We write today to request a meeting to discuss the provision of high quality, patient-centered medication management services to help address the impact of high prescription drug costs for Americans.

As you develop your recommendations in response to the President's executive order, **we urge you to adopt a model, through the medical benefit, that compensates the care team for utilizing a clinical pharmacist to ensure patients are prescribed affordable and correct medications to achieve their clinical goals and positive patient outcomes with lower-cost products and with lower patient cost sharing.**

Optimizing Medication Use Will Reduce Drug Costs

The estimated annual cost of prescription drug–related morbidity and mortality resulting from non-optimized medication therapy was \$528.4 billion in 2016 US dollars.¹ The Get the Medications Right Institute (GTMRx) is a multi-stakeholder coalition committed to advancing health care delivery models that ensure appropriate and personalized use of medication through an evidence-based, cost-effective and team-based approach to medication use. GTMRx has over 1,750 members - including physicians, pharmacists, caregivers, health IT innovators, drug and diagnostics companies, consumer groups, employers, payers and health systems— all aligned around the need to optimize patient outcomes and improve health care value by ensuring appropriate use of medications and gene therapies through comprehensive medication management (CMM). CMM is a standard of care that ensures each patient's medications are individually assessed to determine that each medication is appropriate for the patient, effective for the medical condition, safe given the comorbidities and other medications being taken and able to be taken by the patient as intended. As outlined in the [10 Steps to Achieve CMM](#) graphic, CMM is a multi-step rigorous process that engages all members of the health care team, assuring more effective coordination of care.

¹Watanabe, JH, McInnis, T, and Hirsch, JD. "Cost of Prescription Drug–Related Morbidity and Mortality." *Annals of Pharmacotherapy*, 2018; 52(9), 829–837. doi.org/10.1177/1060028018765159.

Use Clinical Pharmacists on the Care Team to Manage Affordability and Total Cost of the Drug Regimen

In coordination with a patient and their care team, clinical pharmacists can help manage the cost of medication therapy by identifying affordable alternatives and discontinuing use of duplicative or inappropriate medication therapy. When medications are optimized by providing high quality, team-based services, like CMM provided by clinical pharmacists, patients will have better outcomes and lead healthier lives. CMM particularly benefits those living with multiple chronic conditions and receiving multiple drugs in their regimen (e.g. polypharmacy). As their outcomes improve, the total cost of the drug regimen can decrease. For example, as blood pressure or diabetes is better controlled, patients may require lower or less frequent doses of their blood pressure medication or fewer insulin units to manage their blood sugar, making their regimen more affordable.

In many states, clinical pharmacists modify or initiate new medications by protocol, institutional privileging, collaborative practice or independent prescribing authority. **CMMI should test a payment and delivery model that compensates the care team for utilizing a clinical pharmacist to ensure patients are prescribed affordable and correct medications in order to achieve clinical goals and positive patient outcomes with affordable patient drug costs.** Such a model should focus on states where clinical pharmacists are licensed to provide clinical services related to modifying or initiating drug therapy and should ensure that these services are well coordinated with other members of the care team and the patient.

CMMI can evaluate the potential to use clinical pharmacists on the care team to reduce patient drug costs by:

1. Testing a payment model that compensates the care team for CMM

CMM is a standard of care that ensures each patient's medications are individually assessed to determine that each medication is appropriate for the patient, effective for the medical condition, safe given the comorbidities and other medications being taken and able to be taken by the patient as intended. This includes ensuring that patients are able to afford the medication they need, and patients are not utilizing unnecessary or duplicative therapies. Lack of an existing payment structure to reimburse CMM as a service, including care provided by a clinical pharmacist, undermines the ability of care teams to optimize medication use, including by addressing affordability of prescribed medication therapies.

2. Testing a payment model that compensates Medicare and Medicaid providers for complex evaluation and management services provided by a clinical pharmacist on the care team

Current payment models prevent physicians from billing for complex evaluation and management services, provided by a clinical pharmacist on the care team, incident to the physician. Leveraging clinical pharmacists on the care team to provide medication optimization services, including working with patients to **ensure patients are prescribed affordable and correct medications** and discontinue duplicative or inappropriate



medications, to achieve clinical goals **and positive patient outcomes** would require the pharmacist on the care team to provide complex evaluation and management services incident to the physician.

Americans should have access to team-based comprehensive medication management services that improve outcomes and reduces drug and health care costs. President Biden's Executive Order on Lowering Prescription Drug Costs for Americans provides an opportunity for CMMI to test payment and delivery models that leverage clinical pharmacist skill on the care team. CMMI will improve care delivery and ensure patient access to effective and affordable medication therapy.

We would welcome the opportunity to meet with your team to discuss the need for team-based CMMI and other opportunities for the health care team to achieve overall health and drug cost savings. We look to collaborating with the Biden Administration as we collectively work with CMMI to advance innovative health care delivery models.

Please do not hesitate to contact me at kcapps@gtmr.org if you have any questions or if we can provide additional information.

Sincerely,

A handwritten signature in black ink that reads "Katherine H. Capps". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Katherine Herring Capps

Co-Founder & Executive Director

GTMRx Institute

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