



September 18, 2023

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
7500 Security Boulevard
P.O. Box 8013, Baltimore, MD 21244
Mail Stop: C4-26-05

RE: Medicare Prescription Payment Plan Guidance

Dear Administrator Brooks-LaSure:

The Healthcare Leadership Council (HLC) appreciates the opportunity to provide comments on the Centers for Medicare & Medicaid Services' (CMS) Medicare Prescription Payment Plan draft part one guidance.

HLC is a coalition of chief executives from all disciplines within American healthcare. It is the exclusive forum for the nation's healthcare leaders to jointly develop policies, plans, and programs to achieve their vision of a 21st century healthcare system that makes affordable high-quality care accessible to all Americans. Members of HLC – hospitals, academic health centers, health plans, pharmaceutical companies, medical device manufacturers, laboratories, biotech firms, health product distributors, post-acute care providers, homecare providers, group purchasing organizations, and information technology companies – advocate for measures to increase the quality and efficiency of healthcare through a patient-centered approach.

HLC has long been committed to ensuring seniors have access to their choice of affordable, high-quality prescription drugs and was instrumental in the creation of the Part D program, which has been a popular and successful program since its inception. In a recent Morning Consult survey, 91 percent of seniors report being pleased with their Part D plan and 86 percent say it provides good value.¹

We strongly support the objective of the new Medicare Prescription Payment Plan program to help those seniors with high upfront prescription costs smooth payments out over the course of the plan year to better afford their medications. We also recognize that the substantial burden of implementing this new program falls largely on Part D sponsors and hope CMS will work closely with stakeholders to reduce implementation barriers to ensure the success of the program.

Two ways to reduce these implementation barriers are to move away from relying on the point of sale to identify enrollees who may benefit from the program, allowing plans more certainty in administering the program, and to delay the program implementation one calendar year to take effect January 1, 2026. This adjustment would allow plans time to invest in the significant

¹ Medicare Today 2023 Senior Satisfaction Survey, Morning Consult (August 2023), https://medicaretoday.org/wp-content/uploads/2023/08/2307070_HLC_Seniors-on-Medicare_Satisfaction-Memo-2.pdf.

payment infrastructure required and to incorporate requirements in the part two guidance CMS anticipates releasing in 2024. Plan design for 2025 is already underway, and it will be difficult to incorporate the guidance on this program in time.

Thank you for the opportunity to provide feedback on the draft part one guidance of the Medicare Prescription Payment Plan that will build on the success of the Part D program. HLC looks forward to continuing to engage with CMS on this important issue. If you have any questions, please do not hesitate to contact Debbie Witchey at dwitchey@hlc.org or 202-449-3435.

Sincerely,

A handwritten signature in cursive script that reads "Mary R. Grealy". The signature is written in black ink and is positioned below the "Sincerely," text.

Mary R. Grealy
President