



May 16, 2016

Honorable Fred Upton
Chairman
House Committee on Energy and Commerce
United States House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

Honorable Frank Pallone, Jr.
Ranking Member
House Committee on Energy and Commerce
United States House of Representatives
2322A Rayburn House Office Building
Washington, DC 20515

Re: Support for Medicare Part B Payment Model

Dear Chairman Upton and Ranking Member Pallone:

The Center for Medicare Advocacy (the Center) writes to express our support for the Centers for Medicare & Medicaid Services' (CMS) Part B Payment Model as outlined in the Notice of Proposed Rule Making (NPRM) CMS-1670-P published in the Federal Register on March 11, 2016 (81 Fed. Reg. 13230). The Center, founded in 1986, is a national, non-partisan education and advocacy organization that works to ensure fair access to Medicare and quality health care.

The proposed Medicare Part B Payment Model is aimed at both reducing costs and increasing access to effective prescription drugs. At a time when prescription drug costs are growing at a significant pace, many Medicare beneficiaries cannot afford cost-sharing for high-cost medications, while others struggle to find a pharmacy or supplier that will provide lower-cost drugs. CMS' Part B Payment Model seeks to address affordability, in part, by testing a range of value-based pricing tools for a limited number of Part B medications. The goals of the Model are aligned with broader payment reform efforts to transition Medicare from volume-based to value-based payment system and to encourage high-value, evidence-based clinical decision-making. We see no reason that prescription drug pricing should be excluded from such efforts.

Moreover, the Part B Payment Model would simply remove a purely monetary incentive for prescribing more expensive medications. It would not limit providers from prescribing the medications they believe are best suited for each individual patient. The proposed Model, as outlined, proceeds with caution, and includes appropriate safeguards that improve transparency for identifying high value services and decrease discrimination based on health status-related factors.

The Center for Medicare Advocacy's complete comments to the proposed rule are available on our website at: <http://www.medicareadvocacy.org/center-comments-on-proposed-part-b-payment-model/>. For additional information, please contact our Senior Policy Attorney David Lipschutz at dlipschutz@medicareadvocacy.org. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Judith Stein". The signature is fluid and cursive, with the first name "Judith" and last name "Stein" clearly distinguishable.

Judith Stein
Executive Director/Attorney