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November 30, 2020

Demetrios Kouzoukas
Principal Deputy Administrator & Director of the Center for Medicare
Centers for Medicare & Medicaid Services
Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

Attention: CMS-2020-00933

RE: Advance Notice of Methodological Changes for Calendar Year (CY) 2022 for Medicare Advantage (MA) Capitation Rates, Part C and Part D Payment Policies – Part II

Dear Principal Deputy Administrator Kouzoukas:

The Academy of Managed Care Pharmacy (AMCP) thanks the Centers for Medicare & Medicaid Services (CMS) for the opportunity to provide comments in response to its new draft guidance, “*Advance Notice of Methodological Changes for Calendar Year (CY) 2022 for Medicare Advantage (MA) Capitation Rates, Part C and Part D Payment Policies – Part II*” published on October 30, 2020. We appreciate the opportunity to leverage our members’ expertise in providing feedback on this guidance. AMCP offers comments on Potential New Measure Concepts, particularly those focused on COVID-19 vaccination.

AMCP is the nation’s leading professional association dedicated to increasing patient access to affordable medicines, improving health outcomes and ensuring the wise use of healthcare dollars. Through evidence and value-based strategies and practices, the Academy’s 8,000 pharmacists, physicians, nurses, and other practitioners manage medication therapies for the 270 million Americans served by health plans, pharmacy benefit management firms, emerging care models and government.

Updates for Part C and D Star Ratings – Potential New Measure Concepts: COVID-19 Vaccination (Part C)

AMCP appreciates CMS’ solicitation of comments on a potential new measure concept related to the COVID-19 vaccination for the 2023 Part C & D performance measure display page published in Fall 2022 on CMS.gov and for potential inclusion in the Star Ratings program, pending rulemaking. AMCP is actively working with our membership to proactively address and respond to emerging issues and barriers to broad, accessible, equitable, and affordable vaccination in 2021 and beyond. We are particularly focused on ensuring equitable access for a COVID-19 vaccine for populations of limited means, communities of color, and other at-risk populations. If implemented with stakeholder input, we believe a measure for COVID-19

vaccination may be appropriate given the critical role health plans will play in helping to educate and encourage their members to access any COVID-19 vaccine.

In anticipation of a future quality measure, we believe CMS should consider a number of critical factors and unintended consequences that could impact plan performance with a future COVID-19 vaccination measure:

- As of this writing, there are no approved or licensed vaccines, but two candidates have reported out very positive preliminary data. Each vaccine has a very different storage, handling, and administration profile. Given these diverse variables, CMS will need to consider how to properly measure and assess vaccination procedures given there is unlikely to be a single, appropriate vaccination protocol to follow.
- Given that demand for a vaccine is likely to be high, and supply initially finite, CMS will need to consider how to properly control for varied access. Given that the vaccine and its administration will be covered under Part B and not subject to cost-sharing, plans will generally have a limited role in controlling for or enabling access.
- Lastly, given cost-sharing will be waived for COVID-19 vaccinations, we anticipate many beneficiaries will choose to access the vaccine at the most convenient location, which may not be their local, in-network pharmacy. To the extent a beneficiary accesses a vaccine at an out-of-network pharmacy, a plan may have no timely way to be aware of whether or not vaccine administration has occurred.

Going forward, AMCP recommends a close collaboration between CMS, measure developers, and interested stakeholders to develop and implement new measures that are aligned with equitable access to COVID-19 vaccines.

Conclusion

AMCP appreciates the opportunity to comment on the *Advance Notice of Methodological Changes for Calendar Year (CY) 2022 for Medicare Advantage (MA) Capitation Rates, Part C and Part D Payment Policies – Part II*. We are committed to being a valuable resource to CMS on improving access to prescription drugs at lower costs and reducing costs in the healthcare system. If you have any questions regarding AMCP's comments or would like further information, please contact me at 703-684-2600 or scantrell@amcp.org.

Sincerely,



Susan A. Cantrell, RPh, CAE
Chief Executive Officer