

September 28, 2017

Don Wright, MD, MPH
Director
Office of Disease Prevention and Health Promotion
1101 Wootton Parkway
Suite LL100
Rockville, MD 20852

Re: Healthy People 2030 Draft Framework

Dear Dr. Wright:

The Academy of Managed Care Pharmacy (AMCP) thanks the Office of Disease Prevention and Health Promotion (ODPHP) for the opportunity to provide comments on the Healthy People 2030 Draft Framework. AMCP appreciates the leadership of ODPHP on the Healthy People initiative to improve the health and well-being of Americans, an initiative that AMCP has been supportive of since its inception.

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 health care 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.

AMCP supports the inclusion of Foundational Principle #2 in the Healthy People 2030 Draft Framework, which states: Achieving the full potential for health and well-being for all provides valuable benefits to society, including lower health care costs and more prosperous and engaged individuals and communities. AMCP and its members are committed to creating better value for patients by maximizing health outcomes for patients and streamlining the prescription and therapy management process, while moderating cost burdens to our health care system. AMCP members achieve this through a myriad of strategies including medication therapy management (MTM) services and evidence-based formulary development, which enhance the quality of patient care by reducing treatment failures and hospitalizations while improving patient health outcomes. AMCP also supports the expanded use of real-world evidence and advancing approaches for evaluating and rewarding therapeutic value to help pharmacists and physicians make clear, correct, confident and cost-effective patient treatment decisions.

Some specific policy areas and laws that should be updated include:

- Changes to laws governing the Food and Drug Administration (FDA) to allow communication of certain clinical and economic information between payers and pharmaceutical manufacturers about emerging therapies prior to FDA approval to support more accurate forecasting and rate setting, enabling affordable access for patients to new therapies upon FDA approval.
- Support for a competitive marketplace and policies that incentivize development and use of multiple
  treatment options including new, cutting-edge medicines, biosimilars and other affordable therapies so pharmacists and other providers have therapeutic options that best serve patient health and prevent
  unnecessary costs.
- The inclusion of pharmacists as members of health care teams when implementing innovative programs and care models and in policies with goals to improve the health care system.
- The inclusion of pharmacists in health information technology solutions to support interoperable communications in the health care system, including standardized coding for pharmacists' MTM services.

Thank you for the opportunity to provide feedback and for your consideration of our comments. AMCP looks forward to continuing work on these issues with ODPHP and encourages the agency to utilize AMCP and its members as a resource for developing a strategy to meet Foundational Principle #2. 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

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Chief Executive Officer