



August 12, 2019

Ms. Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-6082-NC
P.O. Box 8016
Baltimore, MD 21244-8016

Re: Request for Information; Reducing Administrative Burden To Put Patients Over Paperwork [RIN 0938-ZB54]

Dear Administrator Verma:

The Academy of Managed Care Pharmacy (AMCP) thanks the Centers for Medicare and Medicaid Services (CMS) for the opportunity to provide comments in response to its, "[Request for Information: Reducing Administrative Burden To Put Patients Over Paperwork \[CMS-6082-NC\]](#)," published in the Federal Register on June 11, 2019. We appreciate the opportunity to leverage our members' expertise in offering feedback on this request for information and its focus on ideas to help reduce the burdens placed on clinicians—specifically as it relates to prior authorization (PA).

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.

In its RFI, CMS is seeking additional ideas for improvements to the health care system that would help to reduce unnecessary burdens for clinicians, providers, patients, and their families to increase the quality of health care and lower costs. Specifically, CMS is interested in recommendations that would improve the accessibility and presentation of CMS requirements for PA.

PA is an integral tool to ensure that drug benefits are administered as they have been designed, and that patients receive the medication therapy that they need while controlling costs. The practice of PA helps improve patient outcomes by encouraging the use of therapies that have established evidence of efficacy and safety. While AMCP strongly believes in PA as an effective utilization management tool, we recognize that more can be done to improve the PA process to reduce burden on all clinicians.

AMCP regularly convenes stakeholder Partnership Forums¹ to drive consensus recommendations and actions on some of the most challenging issues in health care. On June 25 – 26, 2019, AMCP took a proactive approach in addressing recent concerns around the burden of PA and convened a Partnership Forum on the topic of, “Optimizing Prior Authorization for Appropriate Medication Selection.”² The diverse group of participants included representatives of managed care, providers, pharmacy, the biopharmaceutical industry and patients. The goal of the Forum was to develop recommendations that will allow stakeholders throughout the health care system to enhance efficiencies to include ways to ease administrative burdens of PA.

Highlights from the Forum revolved around the areas of patient-centric care, role of prescribers, payers’ needs and responsibilities, and health information technology (health IT). High level recommendations and themes to emerge from the Forum include the need for PA programs to be focused on the patient experience; building a greater trust fabric among players, including prescribers, health plans and pharmacists; the importance of tools to support clinical decision making in the PA process; and expanding the use of health IT tools to include electronic prior authorization (ePA) to enable a more efficient health care system.² AMCP will publish a proceedings document in an upcoming issue of the *Journal of Managed Care & Specialty Pharmacy* with detailed findings and recommendations from this Partnership Forum. AMCP will provide additional comments to the docket when these recommendations are published.

Additionally, the AMCP Professional Practice Committee recently developed best practices around nine specific concepts to support more timely, efficient and collaborative PA processes. The concepts, published in the June 2019 issue of AMCP's *Journal of Managed Care & Specialty Pharmacy*³, center on: patient safety and appropriate medication use; clinical decision making; evidence-based review criteria; automated decision support; transparency and advanced notice; emergency access; provider collaboration; need for timeliness and avoiding disruptions in therapy; and cost-effectiveness and value.

Among its recommendations, the concepts urge managed care organizations (MCOs) to: use health IT solutions to reduce paperwork and waste, and improve the patient and clinician experience; collaborate and communicate clearly with providers throughout the PA process; provide advanced notice of formulary changes to the provider and patient; avoid broad or inflexible PA requirements for drug therapies commonly used as part of emergency care; and allow for timely PA approval for medically necessary exceptions and for timely handling of denial appeals.

The Professional Practice Committee also notes that MCOs have the responsibility and opportunity to incorporate clinical and technology advancements into these processes, with a constant goal of

¹ AMCP. Partnership Forum Opportunities. Available at: <https://www.amcp.org/corporate-opportunities/partnership-forums>. Accessed on August 8, 2019.

² AMCP. AMCP Partnership Forum on Prior Authorization Develops Recommendations to Improve Process. July 3, 2019. Available at: <https://www.amcp.org/About/Media/Press-Releases/amcp-partnership-forum-prior-authorization-develops-recommendations-improve-process>. Accessed on August 7, 2019.

³ Prior Authorization and Utilization Management Concepts in Managed Care Pharmacy. *J Manag Care Spec Pharm*. 2019; 25(6):641-44. Available at: <https://www.jmcp.org/doi/pdf/10.18553/jmcp.2019.19069>. Accessed on August 5, 2019.

improving health outcomes and cost-effectiveness. AMCP supports all concepts to ensure patients receive appropriate and timely access to drugs, devices, and other therapeutic agents.³

Conclusion

AMCP appreciates the opportunity to comment on CMS 6082-NC: Request for Information; Reducing Burden to Put Patients Over Paperwork. We are committed to being a valuable resource to CMS on topics that would help alleviate clinician burden issues. 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,

A handwritten signature in black ink, appearing to read "Susan Cantrell". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Susan A. Cantrell, RPh, CAE
Chief Executive Officer