



June 12, 2023

Amy Larrick Chavez-Valdez, Director  
Medicare Drug Benefit and C & D Data Group  
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Jennifer R. Shapiro, Director  
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*Submitted electronically via email to [PartDManufacturerDiscountProgram@cms.hhs.gov](mailto:PartDManufacturerDiscountProgram@cms.hhs.gov)*

Re: Manufacturer Discount Program Draft Guidance Comments

Dear Director Chavez-Valdez and Director Shapiro:

The Academy of Managed Care Pharmacy (AMCP) thanks the Centers for Medicare & Medicaid Services (CMS) for the opportunity to provide comments in response to the Manufacturer Discount Program Draft Guidance issued May 12, 2023.

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, AMCP's nearly 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 health programs.

AMCP applauds CMS' proposal to incorporate the framework from the Coverage Gap Discount Program (CGDP) into the new Manufacturer Discount Program (MDP). Specifically, AMCP believes that implementing the manufacturer discount at the point-of-sale is in the best interest of beneficiaries. This approach will help smooth the way for implementation as industry stakeholders are already familiar with the CGDP processes. AMCP also supports allowing manufacturers to audit third-party administrator (TPA) data to ensure transparency and accountability in the MDP.

AMCP urges CMS to continue to take precautions against potential unintended consequences throughout its implementation of the requirements of the Inflation Reduction Act (IRA). CMS should consider how each element of the program may cause unexpected changes in stakeholder behaviors and corresponding shifts in the market. AMCP believes that the U.S. health care delivery system benefits from a competitive marketplace and encourages CMS to

protect those flexibilities that allow stakeholders to implement innovative ideas to increase access while reducing prescription drug prices.

AMCP appreciates your consideration of the concerns outlined above and looks forward to continuing work on these issues with CMS. If you have any questions regarding AMCP's comments or would like further information, please contact AMCP's Director of Regulatory Affairs, Geni Tunstall, at [etunstall@amcp.org](mailto:etunstall@amcp.org) or (703) 705-9358.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susan Cantrell".

Susan A. Cantrell, MHL, RPh, CAE  
Chief Executive Officer