

March 22, 2020

Sent electronically to: Amy.Larrick@cms.hhs.gov

Ms. Amy Larrick
Director, Medicare Drug Benefit and C and D Data Group
Centers for Medicare & Medicaid Services
Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

Re: CMS Announces Relief for Clinicians, Providers, Hospitals and Facilities Participating in Quality Reporting Programs in Response to COVID-19

Dear Amy and the Part D Team,

We just received the referenced CMS notice and I'd like to reiterate our ask that CMS please consider suspending all pharmacy DIR fees and associated quality measures during this emergency period with no opportunity to assess retroactively once the emergency is over. As you can imagine pharmacy quality scores will definitely be impacted by this emergency period.

I'd also like to reiterate our ask to suspend all pharmacy audits (with no opportunity for recoupment of claims impacted by emergency) as well as halting CY2021 contract negotiations.

Our members are struggling to keep up with the strain on the system and I've seen notices from PBMs dated last week relating to both in store and desk audits for Part D as well as 2021 contracts with terrible DIR provisions that PBMs are asking our members to sign.

Lastly, we are having a member town hall this evening with over 1,250 registrants as of this morning. I'm happy to share with you what we learn from the town hall as to arising needs.

Thanks for all you do and we greatly appreciate the guidance on signature logs. We are also aware that all major PBMs continue to relax requirements (after some cajoling) and we are working diligently to track these notices as well as inform you if PBMs are not complying appropriately.

Sincerely,



Ronna B. Hauser, PharmD
Vice President, Policy & Government Affairs Operations
National Community Pharmacists Association

CC: Kennedy, Shelby L. (CMS/CM)
Miner, Craig (CMS/CM)
Hubbard, Whitney (CMS/CM)
Bendewald, Andrea (CMS/CM)