

December 16, 2021

Amy Larrick Chavez-Valdez
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: Part D Dispensing Fees and Enrollees with Institutionalized Level of Care Needs

Dear Amy:

The National Community Pharmacists Association (NCPA) appreciates the work of the Centers for Medicare and Medicaid Services (CMS) in recognizing the value of LTC pharmacy services in alternative patient settings, including enrollee homes.

NCPA represents America's community pharmacists, including 19,400 independent community pharmacies. Almost half of all community pharmacies provide long-term care services and play a critical role in ensuring patients have immediate access to medications in both community and long-term care (LTC) settings. Together, our members represent a \$67 billion healthcare marketplace, employ 215,000 individuals, and provide an expanding set of healthcare services to millions of patients every day. Our members are small business owners who are among America's most accessible healthcare providers.

NCPA applauds the guidance "Part D Dispensing Fees and Enrollees with Institutionalized Level of Care Needs" dated December 15, 2021, announcing the ability of LTC pharmacies to obtain reimbursement for reasonable costs for services for patients in the home setting. NCPA welcomes the logical extension of previous guidance regarding assisted living facilities (ALF) to the necessary additional services for patients who choose to reside in alternative environments. With the ongoing presence of COVID-19, it is important patients maintain adherence to their prescription drugs in an environment best serving their individualized needs.

On behalf of our membership in long-term care and their patients, NCPA thanks you for providing this clarification.

Sincerely,



Ronna B. Hauser, PharmD
Senior Vice President, Policy & Pharmacy Affairs