

There From the Beginning on DIR Advocacy

NCPA & Member Comments

Congressional Letters

Stakeholder Letters

Patient/Consumer Org. Letters

'18	DIR Proposal 992 MEMBER COMMENTS	Jan.	Support DIR proposal 21 SENATORS 80 REPRESENTATIVES	Jan.	Joint comment to DIR Proposal 120 SIGNATORIES	Jan.	Support elimination of pharmacy DIR 9 SIGNATORIES	Jan.
	Drug Pricing RFI 1,955 MEMBER COMMENTS	July	Address DIR in RFI 21 SENATORS 83 REPRESENTATIVES	Aug.	Response to POTUS on Drug Pricing Blueprint 153 SIGNATORIES	July		
'19	DIR Proposed Rule 3,493 MEMBER COMMENTS	Jan.	Support DIR proposal 29 SENATORS 62 REPRESENTATIVES	Mar.	Response to DIR proposed rule 155 SIGNATORIES	Jan.	Urged CMS to finalize DIR proposal 24 SIGNATORIES	Jan.
	CMS fails to finalize DIR Rule	May	DIR Final Rule Failure 28 SENATORS 105 REPRESENTATIVES	June	Response to POTUS expressing disappointment NCPA, NACDS, APHA, NGA NASP & FMI	June		
			Senate Finance Cmte urges Administration to fix DIR 23 SIGNATORIES	Sept.	Drug Pricing Package to Senate Finance 204 SIGNATORIES	July		
'20	Letter to HHS to halt DIR during PHE	Mar.	NCPA letter to Congressional leaders asking for the elimination of DIR fees	Mar.				
	Letter to Vice President recommending an immediate suspension of DIR fees	Mar.						
	Letter to CMS asking for inclusion of DIR reform in Administrative actions	July						
	Letter to POTUS requesting inclusion of DIR reform in rebate rule	July						
	Letter to OMB advocating for inclusion of DIR fix in final rebate rule	Nov.						

NCPA Advocacy Center Meetings with Administration

April 2018: White House, OMB; **May 2018:** CMS; **July 2018:** HHS; **Aug. 2018:** HHS; **Sept. 2018:** White House, Domestic Policy Council; **Oct. 2018:** HHS, Small Business Administration; **Nov. 2018:** HHS, CMS, White House, OMB; **Dec. 2018:** HHS, White House, Political Office; **Jan. 2019:** White House, Domestic Policy Council; **Feb. 2019:** HHS; **April 2019:** HHS, Small Business Administration; **May 2019:** HHS, White House, Domestic Policy Council, CMS; **July 2019:** CMS; **Oct. 2019:** CMS; **Dec. 2019:** CMS, HHS; **April 2020:** White House; **June 2020:** CMS; **Aug. 2020:** White House; **Sept. 2020:** CMS

National Survey Supports Pharmacy-Related Part D Reforms
June 2018: NCPA commissioned Morning Consult national survey showed overwhelming support for prohibiting PBMs from charging DIR fees to pharmacies.
Oct. 2019: NCPA member survey shows that 58% of independent pharmacies are somewhat or very likely to close in the next 2 years without relief from pharmacy DIR fees. More so, 63% of respondents said that pharmacy DIR is the number one problem facing their pharmacy.

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'21

Letter to incoming CMS Administrator to address DIR fees | **June**

Letter to FTC requesting investigation into and reform of DIR fees | **Dec.**

COURT FILING
NCPA v. Azar
January '21 | Filed lawsuit against HHS Secretary Azar for repeated failure of the agency to address DIR fees in the rulemaking process

To Senate and House to support S. 1909 / H.R. 3554
250 SIGNATORIES | **June**

Letter to Biden Transition team to educate on DIR | **Jan.**

Support DIR reform in budget reconciliation | **Aug.**

To CMS on introduced bills | **Oct.**
4 SENATORS
8 REPRESENTATIVES

Sen. Wyden Letter to CMS for DIR reform | **Oct.**

NCPA statement to Congress for DIR report | **Nov.**

Sen. Wyden Letter to FTC for DIR reform | **Dec.**

NCPA letter to Sen. Wyden to support DIR reform | **Dec.**

'22

Comments to DIR proposed rule | **Mar.**

SBA letter to HHS on DIR proposed rule | **Mar.**

Remarks to FTC/DOJ on Mergers and Acquisitions Listening Forum | **Apr.**

Comments to FTC and DOJ on PBM business practices | **Apr.**

Comments to FTC on PBM practices | **May**

COURT UPDATE
NCPA v. Becerra
January '22 | Judge grants stay in *NCPA vs. Becerra* [formerly *NCPA vs. Azar*]

Sen. Wyden Letter to CMS | **Mar.**

Response to DIR Proposed Rule
232 SIGNATORIES | **Mar.**

To CMS on DIR proposed rule
30 SENATORS | **Mar.**

To HHS on DIR proposed rule
86 REPRESENTATIVES | **Mar.**

Senate and House letters to OMB on DIR proposed rule | **Apr.**

REGULATORY UPDATE
DIR final rule
April '22 | CMS publishes DIR final rule, effective Jan. 1, 2024.

NCPA Advocacy Center Meetings with Administration
August 2021: HHS and DOJ
April 2022: CMS, White House, OMB

National Survey Supports Pharmacy-Related Part D Reforms
November 2021: A NCPA survey of members found that market pressures like DIR fees and vertical integration of PBMs and insurers continue to be their top two concerns.

Advertising Campaign
December 2021 - February 2022: NCPA beltway TV buy pushes Congress to end backdoor PBM fees