November 23, 2026

Submitted electronically via regulations.gov

Mehmet Oz, MD
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-4217-NC
7500 Security Boulevard
Baltimore, MD 21244-1850

Re: Request for Information; Medicare Part D Reasonable and Relevant Pharmacy Contracting Standards (CMS-4217-NC; 91 FR 60568)

Dear Dr. Oz-

We represent Medicare patients and consumers and welcome the opportunity to submit these brief comments on CMS' recent request for information regarding reasonable and relevant contract terms.

While we are not parties to these contracts, our constituencies are impacted, nonetheless. Oner sided contracts that allow plans to reimburse pharmacies below their costs jeopardize patient access, particularly in underserved rural and urban communities.

CMS should recognize that it is entirely unreasonable to expect any provider to provide services at a loss. CMS requires this in the Medicaid program by tying pharmacy payments to a transparent and publicly available acquisition cost benchmark plus an evidence based dispensing fee. CMS should consider a similar approach when establishing reasonable reimbursement standards in Part D.

CMS should also consider the harms that excessive administrative burdens have on patients. Some of the administrative requirements are necessary, but every minute the pharmacist is on the phone trying to navigate preauthorization requirements or preparing for an audit that appears to be retaliatory instead of identifying instances of actual fraud, waste or abuse, is a minute that the pharmacist is not focused on the patient.

As CMS combs through the responses received through the RFI and develops a proposed rule, we urge you to be mindful that while contracts are between the plans and the pharmacies, patients are also affected. Reasonable and relevant contract terms would

ensure pharmacies continue to operate, particularly in underserved communities, and seniors can continue to receive the care they deserve at the pharmacy of their choice.

Thank you for your consideration of our perspective.

Sincerely,

ADAP Advocacy Association
AiArthritis
Biomarker Collaborative
Caregiver Action Network
Community Access National Network
Exon 20 Group
Global Healthy Living Foundation
ICAN, International Cancer Advocacy Network
MET Crusaders
National Community Pharmacists Association
National Grange
NRG1 Energizers
PDL1 Amplifieds
PlusInc
Rural Minds