

March 7, 2014

The Honorable Marilyn B. Tavenner, Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Attention: CMS-4159-P
P.O. Box 8013
Baltimore, MD 21244-8013

Dear Administrator Tavenner:

Thank you for the opportunity to share our views on CMS's proposed changes to the Medicare Part D prescription drug program. The undersigned organizations reflect a wide breadth of companies and organizations representing, among others, multiple healthcare sectors, employers and patients that share your commitment to a strong Medicare that meets the healthcare needs of its beneficiaries.

We are deeply concerned that the proposed rule is inconsistent with the spirit and purpose of Medicare Part D, represents unnecessary changes to programs that are already extraordinarily effective in containing costs and, most importantly, will severely impede beneficiaries' access to affordable health plans and medicines. We urge you in the strongest terms to withdraw the proposed rule that would have unintended consequences for seniors and beneficiaries with disabilities.

As you know, Medicare Part D is an undeniable success story. The Part D program has maintained stable, affordable average monthly premiums, enjoys a 90 percent approval rating among beneficiaries, and has program costs that are more than 40 percent below original Congressional Budget Office projections.

The proposed rule threatens to disrupt the positive effect the program is having on beneficiaries' health and the Medicare program as a whole. Each undersigned organization has concerns about specific provisions, but there are overarching issues on which we are unanimous in our objections.

First, the rule would significantly reduce beneficiaries' choice of plans and medicines and lead to disruptions in care. Millions of seniors and beneficiaries with disabilities would lose their current plan of choice or face changes in coverage. Beneficiaries value choice in the Part D marketplaces, and a range of options promotes both competition and innovation in benefit designs that improve the way beneficiaries' access their Part D benefits and services.

Second, it would fundamentally transform the market-based competitive models that have made the Part D program highly successful. The rule would dramatically expand the federal government's role in Medicare Part D despite the fact that there is no compelling reason for doing so. Reshaping Part D in this way will neither improve quality and affordability, nor incentivize plan innovation.

Third, the proposed regulation will impose a large cost burden that will impede the ability of plan sponsors and other health sectors to continue offering affordable, quality care to patients. These new costs will drive higher premiums for millions of beneficiaries and lead to higher costs for Medicare without tangible gains in service or quality for beneficiaries.

And, finally, the timing of this omnibus proposed rule has created great uncertainty as many of our organizations and the companies we represent have already begun preparations for the 2015 plan year. Many of these organizations are also currently devoting significant resources to ensuring the success of the health insurance exchanges, and this would represent a tremendous additional burden. With the June bid submission deadline in mind, we urge you to withdraw the proposed rule in a timely manner in order to minimize disruption for beneficiaries when it comes time to make plan selections in October.

In summary, the Part D proposed rule will not only fail to achieve its intended goals but will reduce choice and impose higher costs on beneficiaries and taxpayers. Medicare Part D has succeeded beyond expectations in enhancing the health and well-being of enrollees. Weakening these programs will result in a less healthy patient population and, consequently, increased Medicare costs in the long term.

Consequently, we urge CMS to withdraw the proposed rule that, as written, would fundamentally undermine the success of the Part D program for beneficiaries. We look forward to working with you to assure that Medicare continues to offer affordable, high-quality health coverage and accessible medications. It is a privilege to work with you to meet the needs of current and future Medicare beneficiaries.

Sincerely,

Abcam Inc
Academy of Managed Care Pharmacy
Addario Lung Cancer Foundation
Advocates for Responsible Care (ARxC)
Aetna
AIDS Alliance
AIDS Connecticut (ACT)
AIDS Delaware
AIDS Services for the Monadnock Region
Allergan
Alliance for Paired Donation
Alliance for Patient Access
Alzheimer's and Dementia Resource Center
Alzheimer's & Dementia Alliance of Wisconsin
Alzheimer's Arkansas
Amada Senior Care
America's Health Insurance Plans
American Autoimmune Related Diseases Association (AARDA)
American Dental Association
American Kidney Fund
American Osteopathic Association
American Society of Plastic Surgeons
Amgen
Analtech, Inc.
Arizona Bioindustry Association, Inc. (AZBio)
Arizona Urological Society
Arkansas Psychiatric Society
Association of Black Cardiologists
Association of Community Cancer Centers

Asthma and Allergy Foundation of America
Asthma and Allergy Foundation of America, New England Chapter
Atlanta Black Nurses Association
BayBio
Bio Nebraska Life Sciences Association
Biocom
BioForward
BioHouston
BioNJ
BioOhio
Bioscience Association of West Virginia
Biotechnology Industry Organization
Bismarck-Mandan Chamber
BlueCross BlueShield Association
Boehringer Ingelheim Pharmaceuticals, Inc.
California Asian Pacific Chamber of Commerce (CalAsian Chamber)
California Healthcare Institute (CHI)
California Hepatitis C Task Force
California Senior Advocates League
California Urological Association
Cancer Support Community Central Ohio
Capitol Insurance Brokers, Inc.
Caregiver Action Network
Cascade AIDS Project (CAP)
Catamaran
Center for Lawful Access and Abuse Deterrence (CLAAD)
Center for Medicine in the Public Interest
Centerstone
Central Florida Behavioral Health Network
Central New York HIV Care Network
Centro de Mi Salud, LLC
CETPA, Inc.
Chemistry Council of New Jersey
Cigna
Citrus Council, National Kidney Foundation of Florida
Coalition of Texans with Disabilities
Colon Cancer Alliance
Colorado BioScience Association
Colorado Cross-Disability Coalition
Colorado Gerontological Society
Colorado State Grange
Combined Health Agencies
Community Access National Network (CANN)
Community Health Action Network (CHAN)
Community Health Charities of Iowa
Community Health Charities of Nebraska
Community Health Charities of Wisconsin
Community Healthy Charities of Florida
Council for Affordable Health Coverage
CURE--The Bioscience Network of Connecticut
CVS Caremark

Decatur County Hospital
Deckerville Community Hospital
Delaware Academy of Medicine
Delaware BioScience Association
Delaware HIV Consortium
Delaware Public Health Association
Diabetes Community Action Coalition of Fulton County
Duval County Medical Society (DCMS)
East Cooper Community Outreach
Easter Seals
Easter Seals Arkansas
Easter Seals Iowa
Easter Seals Massachusetts
EDSers United
Elder Care Advocacy of Florida
Eli Lilly and Company
Embracing Latina Leadership AllianceS (ELLAS)
Epilepsy California
Epilepsy Foundation of East Tennessee
Epilepsy Foundation of Greater Los Angeles
Epilepsy Foundation of Northeastern New York
Epilepsy Foundation of San Diego County
Epilepsy Foundation of Western Wisconsin
Express Scripts
FAIR Foundation
Federation of Families for Children's Mental Health -Colorado Chapter
Filipino American Service Group Inc. (FASGI)
Florida HIV/AIDS Advocacy Network
Florida Partners in Crisis
Florida State Hispanic Chamber of Commerce
Generic Pharmaceutical Association
Georgia Bio
Georgia Osteoporosis Initiative
GlaxoSmithKline
GLMA: Health Professionals Advancing LGBT Equality
Global Genes Project
Global Healthy Living Foundation
Global Pharma Analytics, Inc.
H.E.A.L.S of the South
Hampton Roads Technology Council
HealthCare Institute of New Jersey (HINJ)
Healthcare Leadership Council
HealthHIV
Healthy Heritage Movement, Inc.
Heart Rhythm Society
Hep C Connection, Denver CO
Hepatitis Foundation International
HepFlorida
HepInfoNow
Hospira, Inc.
Human Rights Campaign

Humana
Illinois Biotechnology Industry Organization—iBIO®
Indiana Health Industry Forum
Indiana State Grange
Indianapolis Urban League
International Foundation for Autoimmune Arthritis
Iowa Biotech Association
Iowa Orthopaedic Society
Iowa State Grange
It's About Me Breast Cancer Awareness Association
Johnson & Johnson
Kentucky Chamber
Kentucky Life Sciences Council
Kidney Cancer Association
Latino Diabetes Association (LDA)
Let's Talk About Change
Licensed Professional Counselors Association of North Carolina
Life Sciences Greenhouse of Central PA
Lifelong AIDS Alliance
LifeScience Alley®
LPCA, the Licensed Professional Counselors Association of GA
Lupus Foundation of America
Lupus Foundation of America - DC/MD/VA Chapter
Lupus Foundation of America, Arkansas Chapter
Lupus Foundation of Florida, Inc.
Lupus Foundation of Mid and Northern New York, Inc.
Macular Degeneration Support
Massachusetts Association for Mental Health
Massachusetts Health Council
MassBio
Medical Alliance for MS (MA4MS)
Medical Oncology Association of Southern California, Inc
Medical Partnership for MS (MP4MS)
MedTech Association (NY)
Men's Health Network
Mental Health America of Colorado
Mental Health America of Georgia
Mental Health America of Indiana
Mental Health America of Texas
Mental Health Association in California
Mental Health Association in Tulsa
Mental Health Coalition of NC
Mental Health Systems
Merck
MichBio
Michigan Clinic
Michigan Lupus Foundation
Michigan Osteopathic Association
Michigan Rural Healthcare Preservation, Inc.
Minnesota State Grange
Missouri Association of Osteopathic Physicians and Surgeons

Missouri Biotechnology Association
MOBIO
Molly's Fund Fighting Lupus
Montana BioScience Alliance
Montana State Grange
Multiple Sclerosis Association of America
NAIFA - Alabama
NAIFA - Alaska
NAIFA - Arizona
NAIFA - Arkansas
NAIFA - California
NAIFA - Colorado
NAIFA - Connecticut
NAIFA - Delaware
NAIFA - Florida
NAIFA - Georgia
NAIFA - Greater Washington DC
NAIFA - Hawaii
NAIFA - Idaho
NAIFA - Illinois
NAIFA - Indiana
NAIFA - Iowa
NAIFA - Kansas
NAIFA - Kentucky
NAIFA - Louisiana
NAIFA - Maine
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NAIFA - Montana
NAIFA - Nebraska
NAIFA - Nevada
NAIFA - New Hampshire
NAIFA - New Jersey
NAIFA - New Mexico
NAIFA - New York State
NAIFA - North Carolina
NAIFA - North Dakota
NAIFA - Ohio
NAIFA - Oklahoma
NAIFA - Oregon
NAIFA - Pennsylvania
NAIFA - Rhode Island
NAIFA - South Carolina
NAIFA - South Dakota
NAIFA - Tennessee
NAIFA - Texas
NAIFA - Utah

NAIFA - Vermont
NAIFA - Virginia
NAIFA - Washington
NAIFA - West Virginia
NAIFA - Wisconsin
NAIFA - Wyoming
NAMI Colorado
NAMI Florida
NAMI Georgia
NAMI Indiana
NAMI IOWA
NAMI Kentucky
NAMI Mass
NAMI Montana
NAMI Nebraska
NAMI North Dakota
NAMI Ohio
NAMI Oklahoma
NAMI South Carolina
NAMI Utah
NAMI-KC
National Alliance for Caregiving
National Alliance on Mental Illness
National Association of Health Underwriters (NAHU)
National Association of Hepatitis Task Forces
National Association of Hispanic Nurses - El Paso, Texas Chapter
National Association of Hispanic Nurses (NAHN)
National Association of Insurance and Financial Advisors (NAIFA)
National Association of Manufacturers
National Association of Nutrition and Aging Services Programs (NANASP)
National Association of Specialty Pharmacy (NASP)
National Coalition on Health Care
National Council for Community Behavioral Healthcare
National Council of Asian Pacific Islander Physicians
National Council of Negro Women Inc., View Park - Los Angeles
National Down Syndrome Society (NDSS)
National Gay and Lesbian Task Force
National Grange
National Hispanic Medical Association
National Medical Association
National Minority Quality Forum
National Osteoporosis Foundation
National Retail Federation
National Spasmodic Torticollis Association
National Tay-Sachs and Allied Diseases Association
NC Psychological Association & Foundation
NCBIO
Neurofibromatosis, Mid-Atlantic
New England Coalition for Cancer Survivorship
New Mexico Biotechnology & Biomedical Association (NMBio)
Newark Senior Center

NewYorkBIO
NJ Mayors Committee on Life Sciences
North Carolina AIDS Action Network
Novartis
Nuclea Biotechnologies, Inc.
Ohio Chamber of Commerce
Ohio State Grange
Older Americans of Florida
One in Four Chronic Health
OptumRx
Oregon Bioscience Association
Otsuka
Pacific Northwest Chapter of the Transplant Recipients International Organization (TRIO)
Parkinson's Association of San Diego
Partnership to Fight Chronic Disease (PFCD)
Pennsylvania Bio
Pfizer Inc
Pharmaceutical Care Management Association
Pharmaceutical Research and Manufacturers of America
Playing For Life
Plaza Community Services
Potomac Grange
Prescription Assistance Network of Stark County, Inc.
Prevent Cancer Foundation
Prime Therapeutics, LLC
Project ReDirect-DC
Psychiatric Society of Virginia
Puerto Rico AIFA
RAIN Oklahoma
Rare Disease United Foundation
Renal Support Network
RetireSafe
Rhode Island State Grange
Rio Grande Valley Diabetes Association
Rocky Mountain Stroke Center
Rush To Live
Salud USA
San Antonio AIDS Foundation
Sanofi
SCBIO
SD Biotech
Sickle Cell Disease Association of Florida
Skip To My Lupus, Inc
Small Business & Entrepreneurship Council
SoCalBio
Society for Women's Health Research (SWHR)
South Carolina Nurses Association (SCNA)
South Dakota CARES INC
South Dakota State Orthopaedic
Southern MS Consortium (seMSc)
StopAfib.org

Sunovion Pharmaceuticals Inc
Tech Council of Maryland
Tennessee Association of Health Underwriters
Tennessee Orthopaedic Society
Tennessee State Grange
Texas Association of Business (TAB)
Texas BioAlliance
Texas Conservative Coalition Research Institute
Texas Healthcare and Bioscience Institute
Texas Nurse Practitioners
Texas Renal Coalition (TRC)
Texas Transplantation Society
The AIDS Institute
The ALS Association
The ALS Association, Tennessee Chapter
The Arc of New Jersey
The G.R.E.E.N. Foundation
The Latino Coalition
The National Coalition for LGBT Health
Tuberous Sclerosis Alliance
U.S. Chamber of Commerce
United Spinal Association
United Way Association of South Carolina
US Pain Foundation
US Script
Virginia Bio
Wall-Las Memorias Project
Walmart
Washington Biotechnology & Biomedical Association (WBBA)
Washington Psychiatric Society
Washington State Nurses Association
WellPoint
Western Reserve Area Agency on Aging
Western Section of the American Urological Association
Women Against Prostate Cancer
Wound Care Clinic – ESU, Inc

Cc: The Honorable Dave Camp
The Honorable Orrin Hatch
The Honorable Sander Levin
The Honorable Fred Upton
The Honorable Henry Waxman
The Honorable Ron Wyden