



NATIONAL ASSOCIATION OF
SPECIALTY PHARMACY

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National Association of Specialty Pharmacy (NASP) Calls for DIR Reform in Response to CMS Medicare Part D Rule

WASHINGTON, DC – The National Association of Specialty Pharmacy (NASP) submitted extensive [comments](#) to the Centers for Medicare and Medicaid Services (CMS) supporting Medicare Part D reforms that will lower out-of-pocket costs for beneficiaries, improve the transparency of fees, and improve the competitive market balance under the Medicare Part D program. NASP acknowledges and thanks the administration for its ongoing focus on these and other key issues that affect specialty patients and the pharmacies that work to address their complex health care needs. NASP’s comments were issued in response to the CMS [proposed rule](#) titled “Modernizing Part D and Medicare Advantage to Lower Drug Prices and Reduce Out-of-Pocket Expenses.”

“The proposed rule includes needed regulatory adjustments related to direct and indirect remuneration (DIR) fees, and recognizes that current fees have resulted in substantial increased costs for seniors. NASP supports CMS’s efforts to reduce drug prices at the point of sale and stand up a system that fairly and accurately assesses pharmacy performance, and we offer our analysis and recommendations on how to implement such reforms to specifically address the needs of specialty patients and the pharmacies that serve their needs,” said Sheila Arquette, NASP Executive Director. “We are so pleased the administration has recognized the extent to which DIR fees harm patients, Medicare, and the pharmacies that serve them. DIR, in its current form, has a disproportionate impact on independent specialty pharmacies. Now is the time for the administration to exercise its authority to amend regulation and implement these much needed reforms.”

The proposed regulation seeks to reduce Medicare beneficiary drug costs (copays and coinsurance) by amending the definition for negotiated price and requiring all pharmacy price concessions to apply at the point of sale. The proposed regulation seeks feedback as to whether and how CMS should develop a standard set of pharmacy performance metrics. In its comments, NASP advocates for CMS to finalize its proposal to amend the definition of negotiated price and move all pharmacy price concessions to the point of sale beginning in 2020 and simultaneously approve a standard set of metrics to fairly assess pharmacy performance based on the drugs dispensed and disease state being managed.

In addition to issuing comments on the rule, NASP joined the National Community Pharmacists Association and the National Association of Chain Drug Stores in a [letter](#) to CMS urging action on the proposed reforms to move all pharmacy price concessions to the point of sale and to move toward a system of standardized quality metrics for pharmacies beginning in 2020. NASP also joined in a broader

[letter of support](#) signed by 155 multi-disciplined stakeholders representing pharmacies and pharmacists. NASP and 62 other organizations sent a [letter](#) in coordination with the Pharmacy Quality Alliance (PQA), addressing the need to move forward with a standardized set of metrics to evaluate pharmacy performance.

NASP looks forward to working with the administration and Congress on these Part D reforms to reduce costs to Medicare beneficiaries and the broader Medicare program for specialty drugs and ensure access to the specialty drugs and services needed to improve health and reduce overall healthcare costs.

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The National Association of Specialty Pharmacy (NASP) is the only national association representing all stakeholders in the specialty pharmacy industry. NASP members include the nation's leading independent specialty pharmacies, pharmaceutical and biotechnology manufacturers, group purchasing organizations, patient advocacy groups, integrated delivery systems and health plans, technology and data management vendors, wholesalers/distributors and practicing pharmacists. With over 100 corporate members and 1,500 individual members, NASP is the unified voice of specialty pharmacy in the United States.