



NATIONAL ASSOCIATION OF  
CHAIN DRUG STORES



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Richard J. Gilfillan, M.D.  
Director, Center for Medicare & Medicaid Innovation  
CMS Innovation Center  
Centers for Medicare & Medicaid Services  
7500 Security Blvd  
Baltimore, MD 21244

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**RE: Enhancing Pharmacy's Role in Innovation Center Projects**

Dear Dr. Gilfillan,

The National Association of Chain Drug Stores (NACDS) and the National Community Pharmacists Association (NCPA) applaud the Center for Medicare and Medicaid Innovation (Innovation Center) for the work it has done in testing new and innovative solutions to issues facing the healthcare industry. For example, community pharmacies appreciate the opportunity to participate in existing CMMI programs, such as Partnership for Patients. These programs help to improve patient health, while highlighting the important role of pharmacists in the healthcare system.

We are writing to urge the Innovation Center to use its authority under section 1115A(d) of the Social Security Act to expand the role of pharmacists in the various new innovative programs that are being supported by CMMI. These include the new ACO models, community-based transitions of care, and bundled payment initiatives. Unfortunately, we understand that some of the governing bodies of these new models indicate that they cannot include pharmacists because the statute does not allow pharmacists to be part of the governance structure or because current Medicare law does not recognize pharmacists as providers. Because of this lack of provider status, pharmacists may have been limited in their participation in Innovation Center activities.

Permitting pharmacists to practice to their maximum capabilities within these new delivery models would help increase medication adherence and coordination between healthcare settings, result in higher rates of vaccinations, and reduce the burden of the physician shortage, particularly with the influx of new patients in 2014 through the Health Care Marketplaces and the expansion of Medicaid eligibility.

In establishing the Innovation Center, section 1115A (d) of the Social Security Act grants the Secretary the authority to waive such requirements of Title XVIII as may be necessary for carrying out the testing of innovative models of care. This especially relates to projects that address populations for which there are deficits in care leading to poor clinical outcomes and potentially avoidable expenditures.



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Because pharmacists have the proven ability to provide services which lead to better clinical outcomes and lower healthcare costs, we urge the Innovation Center to use its authority to find mechanisms for pharmacists to participate in these programs, such as granting pharmacists provider status for the purpose of participating in Innovation Center projects.

Doing so would allow pharmacists to join other healthcare professionals in the new patient care opportunities taking place at the Innovation Center. Without this action, pharmacists may be unable to provide and bill for their services and are therefore not being utilized by participants to the maximum extent possible. This may be limiting the ways in which pharmacists can contribute to meeting the Innovation Center's goals.

We thank you for the opportunity to comment and look forward to working with the Innovation Center in the future. We would appreciate the opportunity to discuss this with you in more depth soon.

Sincerely,

Carol Kelly  
Senior Vice President  
Government Affairs and Public Policy  
National Association of Chain Drug Stores

John Coster, Ph.D., R.Ph.,  
Senior Vice President  
Government Affairs  
National Community Pharmacists Association