



Academy of
Managed Care
Pharmacy®

November 29, 2016

Woody Eisenberg, MD, FACP
Senior Vice President, Performance Measurement and Strategic Alliances
Pharmacy Quality Alliance
6213 Old Keene Mill Court
Springfield VA, 22152

Re: PQA Endorsement Consideration of Two New Performance Measures: *Concurrent Use of Opioids and Benzodiazepines* and *Adherence to Non-Infused Disease Modifying Agents Use to Treat Multiple Sclerosis*

Dear Dr. Eisenberg;

The Academy of Managed Care Pharmacy (AMCP) thanks the Pharmacy Quality Alliance (PQA) for the opportunity to provide comments in response to the *Call for Comments on PQA Endorsement Consideration of Two New Performance Measures*.

AMCP is the nation's leading professional association dedicated to increasing patient access to affordable medicines, improving health outcomes and ensuring the wise use of health care dollars. Through evidence- and value-based strategies and practices, the Academy's 8,000 pharmacists, physicians, nurses and other practitioners manage medication therapies for the 270 million Americans served by health plans, pharmacy benefit management firms, emerging care models and government.

Concurrent Use of Opioids and Benzodiazepines - *The percentage of individuals 18 years and older with concurrent use of prescription opioids and benzodiazepines.*

AMCP Comments:

- AMCP members have expressed concern that this measure does not include muscle relaxants. Inclusion of muscle relaxants would consider the “triple threat” associated with concurrent use of opioids, benzodiazepines, and muscle relaxants. However, AMCP understands that PQA considered a “triple threat” measure but voted to not move forward with it at this time due to insufficient evidence (derived from national guidelines, literature searches, and expert opinion) about the combined harm. AMCP therefore recommends that PQA continue to evaluate the literature and consider the addition of muscle relaxants in the future if the level of evidence strengthens.

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- AMCP also cautions PQA to proceed with discretion on this measure as three additional opioid measures were approved in May 2016. AMCP members are concerned that there may be too many opioid measures that will be implemented within a short timeframe and may compete against one another. AMCP further recommends that if approved, this measure should initially be considered a display measure prior to consideration as part of the Star Ratings. AMCP will provide this recommendation to the Centers for Medicare and Medicaid Services (CMS) if approved.

Adherence to Non-Infused Disease Modifying Agents Used to Treat Multiple Sclerosis - *The percentage of patients 18 years and older who met the Proportion of Days Covered (PDC) threshold of 80% during the measurement period for medications treating multiple sclerosis (MS).*

AMCP Comments:

- Overall, AMCP members had no major concerns with this measure.

Thank you for the opportunity to provide feedback and for your consideration of our comments. AMCP looks forward to continuing work on these measures with PQA. If you have any questions regarding AMCP's comments or would like further information, please contact me at 703-683-8416 or scantrell@amcp.org.

Sincerely,



Susan A. Cantrell, RPh, CAE
Chief Executive Officer