



April 29, 2024

Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Office of Strategic Operations and Regulatory Affairs
Division of Regulations Development
7500 Security Boulevard
Baltimore, MD 21244–1850

Submitted electronically via regulations.gov

Re: The Medicare Advantage and Prescription Drug Programs: Part C and Part D
Medicare Prescription Payment Plan Model Documents (CMS–10882)

Dear Administrator Brooks-LaSure:

The Academy of Managed Care Pharmacy (AMCP) thanks the Centers for Medicare & Medicaid Services (CMS) for the opportunity to provide comments in response to “The Medicare Advantage and Prescription Drug Programs: Part C and Part D Medicare Prescription Payment Plan Model Documents” (Model Documents), issued on February 29, 2024.

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 healthcare dollars. Through evidence and value-based strategies and practices, AMCP’s nearly 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 health programs.

AMCP and its members commend CMS for supporting plan sponsors in their efforts to implement the requirements of the Medicare Prescription Payment Plan (MPPP). The Model Documents provide much needed clarity for plan sponsors on how they can meet the regulatory requirements when communicating with beneficiaries about the MPPP. AMCP encourages CMS to further simplify the language in the Model Documents to meet the needs of beneficiaries with limited literacy, limited health literacy, or limited English proficiency. Educational materials on the MPPP should consistently incorporate clear and concise language and multiple language translations to ensure the information is understood by everyone.

AMCP and its members also suggest the development of additional educational resources such as cost calculators and other decision tools to provide beneficiaries with greater insights into potential out-of-pocket costs savings when enrolling in the MPPP.



AMCP appreciates your consideration of the concerns outlined above and looks forward to continuing work on these issues with CMS. If you have any questions regarding AMCP's comments or would like further information, please contact AMCP's Manager of Regulatory Affairs, Vicky Jucelin, at vjucelin@amcp.org or (571) 858-5320.

Sincerely,

Susan A. Cantrell, MHL, RPh, CAE
Chief Executive Officer