



September 13<sup>th</sup>, 2021

Chiquita Brooks-LaSure, Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attn: CMS-1751-P  
Mail Stop C4-26-05  
7500 Security Boulevard  
Baltimore, MD 21244-1850

**Re: Letter to CMS for Payment Mechanism for Medication Management Services through proposed Medicare Physician Fee Schedule (CMS-1751-P)**

Dear Administrator Brooks-LaSure:

We are members of the [Get the Medications Right Institute \(GTMRx\)](#), a multi-stakeholder organization of over 1,400+ members and 900+ companies of payers, providers, and consumers committed to ensuring patients have access to appropriate and personalized use of medications and gene therapies to optimize outcomes and reduce costs (See Addendum A—GTMRx Membership List).

We believe that CMS's strong commitment to advancing value-based care (VBC) in Medicare for 61.7 million enrollees should be a continued focus and is urgently needed to more rapidly expand innovative payment models that will advance patient care services that will optimize medication use through [comprehensive medication management \(CMM\)](#) in practice for advanced primary care and specialty care to ensure better care, lower costs, and higher patient and provider satisfaction.<sup>1</sup> We urge CMS to move rapidly as practices moving toward VBC rely on alternative payment methodologies to drive provider transformation essential in the delivery of new and more effective services.

However, as we transition to VBC, we also urge the Centers for Medicare & Medicaid Services (CMS) to ensure that today's providers can fully engage all members of the healthcare team, including clinical pharmacists, in patient care. Specifically, we urge CMS to reverse a 2020 policy change limiting physicians to billing only the lowest-level evaluation and management (E/M) code for pharmacist-provided incident-to services, regardless of the duration and complexity of the E/M services provided.<sup>2</sup> This policy shift undermines health system care models that leverage care team members, including clinical pharmacists to support physicians, thereby threatening patient access to critical services, including comprehensive medication management (CMM). CMM is more rigorous in process and purpose, team-based, information-focused, and patient-centric than medication therapy management

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<sup>1</sup> McFarland MS, Buck ML, Crannage E, Armistead LT, Ourth H, Finks SW, McClurg MR; writing on behalf of the Get the Medications Right Institute. Assessing the Impact of Comprehensive Medication Management on Achievement of the Quadruple Aim. *Am J Med.* 2021 Apr;134(4):456-461. doi: 10.1016/j.amjmed.2020.12.008. Epub 2021 Jan 17. PMID: 33472055.

<sup>2</sup> Centers for Medicare & Medicaid Services, Physician Fee Schedule CY 2021 Final Rule, 85 Fed. Reg. 84592-3 (Dec. 28, 2020), *available at* <https://www.govinfo.gov/content/pkg/FR-2020-12-28/pdf/2020-26815.pdf> (Limiting physicians supervising pharmacist-provided incident-to services to billing code 99211 for those services, despite the fact that many of the services provided by pharmacists meet the complexity and duration criteria set forth for code 99212-14).

(MTM), which is typically provided under Part D. CMM is an enhanced level of service that is provided through team-based care supported via collaborative practice agreements<sup>3</sup> and/or credentialing, and privileging procedures to allow non-physician providers to be officially designated as members of the medical staff.

As an important member of the patient care team at hospitals, health systems, clinics, and physician practices across the nation, today's clinical pharmacists provide team-based care in both the inpatient and outpatient setting. Clinical pharmacists collaborate with physicians, nurses, and other healthcare professionals to ensure safe and effective medication use and improve patient health outcomes while reducing workload burdens on physicians and other clinical staff.<sup>4,5</sup> Working in collaborative practice with physicians, they educate patients and their caregivers about medications, monitor drug therapy, and coordinate communication between patients, insurers, and interdisciplinary specialty providers.

Drug therapy is involved in 76% of physician office visits and is the sole treatment for many acute and chronic conditions. Problems associated with medication use, such as non-adherence, polypharmacy, errors and adverse events, result in 500,000 emergency room visits and 100,000 hospitalizations yearly, costing the health system over an estimated five billion dollars.<sup>6</sup> Clinical pharmacists' management of medication therapy has been shown to improve transitions of care and reduce hospital readmissions.<sup>7</sup>

Unfortunately, the CMS E/M policy change significantly undervalues the critical role of clinical pharmacists in providing medication management services to Medicare beneficiaries. The CMS E/M policy change is fundamentally at odds with efforts to implement care models that include clinical pharmacists. Many commercial payers as well as states recognize and acknowledge pharmacists to be qualified health professionals (QHPs) whose services can be billed incident-to a physician using the higher-level E/M codes. The American Medical Association (AMA) CPT Code Book also recognizes pharmacists as QHPs eligible to "report services." Indeed, CMS issues National Provider Identifier numbers to pharmacists for just this reason. Pharmacists and pharmacies can bill using their NPI number for immunizations and pharmacists can bill Diabetic Self-Management Training (DSMT) and Medicare Diabetes Prevention Program services if they meet the requirements for these services.

CMS' policy preventing hospitals, health systems, clinics, and physician practices from billing for clinical pharmacist services provided incident to a physician service serves as an unnecessary barrier to broader adoption of innovative team-based care that enhances quality care for our patients. Nonoptimized medication use contributes to an estimated 275,689 deaths per year and cost \$528.4 billion annually.<sup>8</sup> CMM, provided by an interprofessional team to include the clinical pharmacist, is an important tool to improve these outcomes.

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<sup>3</sup> Under collaborative practice agreements (CPAs), clinical pharmacists are able to add, modify, and discontinue medications; order lab tests; and monitor medication regimes.

<sup>4</sup> McFarland MS, Nelson J, Ourth H, Groppi J and Morreale A. Optimizing the primary care clinical pharmacy specialist: Increasing patient access and quality of care within the Veterans Health Administration. *J Am Coll Clin Pharm.* 2020;3:494-500.

<sup>5</sup> Funk K, Pestka D, McClurg MR, Carroll J, Sorensen T. Primary Care Providers Believe that Comprehensive Medication Management Improves their Work-Life. *Journal of American Board of Family Medicine.* 2019; 32(4): 462-473. doi: 10.3122/ jabfm.2019.04.180376.

<sup>6</sup> Budnitz DS, Pollock DA, Weidenbach KN, et al. National surveillance of emergency department visits for outpatient adverse drug events. *JAMA.* 2006;296:1858-1866; *See also* Ni, W., Colayco, D., Hashimoto, J., Komoto, K., Gowda, C., Wearda, B., McCombs, J. Budget Impact Analysis of a Pharmacist Provided Transition of Care Program. *Journal of Managed Care & Specialty Pharmacy.* Feb 2018.

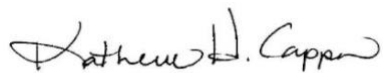
<sup>7</sup> Budlong, H, Brummel, A, Rhodes, A, Nici, H. Impact of Comprehensive Medication Management on Hospital Readmission Rates. *Population Health Management* 2018. 21(5): 395-400.

<sup>8</sup> Watanabe JH, McInnis T, Hirsch JD. Cost of Prescription Drug-Related Morbidity and Mortality. *Annals of Pharmacotherapy* 2018, Vol. 52(9) 829-837.

Reversing the 2020 E/M policy change and allowing hospitals, health systems, clinics, and physician practices to bill for the services provided by the clinical pharmacists on their care teams, incident to a physician, would help ensure our patients have access to the best possible medication management. Barring a full reversal of the policy change, we urge CMS to adopt either a clinical pharmacist modifier for existing E/M codes or a new clinical pharmacist-specific code set that corresponds to the higher-level E/M codes and accounts for the duration and complexity of pharmacist-provided incident-to services.

We look forward to working with you to implement regulations that allow hospitals, health systems, clinics, and physician practices to fully integrate and reimburse care team members providing CMM to optimize patient outcomes.

Sincerely,



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Co-Founder & Executive Director  
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Vienna, VA 22182  
Office: 703-394-5398  
Cell: 571-276-3116

CC:

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Washington, DC 20001



## Addendum A: GTMRx Membership List

### Funding Board Members:

American College of Clinical Pharmacy (ACCP)  
American Society of Health-System Pharmacists (ASHP)  
Johnson and Johnson

### Executive Members:

California Chronic Care Coalition (CCCC)  
Kaiser Permanente  
Tabula Rasa HealthCare  
Veterans' Health Administration

### Strategic Partners:

AACP	Coalition of State	Kimber Boothe
AbbVie	Rheumatology Organizations	LabCorp
AMGEN	(CSRO)	NAHCP
Association of Accessible Medications	Cureatr	OneOme
Avera Health	EmpiRx	PhactMI
Breast Cancer Index	Genentech	Teachers Retirement System of Kentucky
Cleveland Clinic	Genomind	
	Journal of Precision Medicine	

### Employer Coalition Signing Members:

Dallas/Fort Worth Business Group on Health	Pittsburgh Business Group on Health
Florida Alliance for Healthcare Purchasers	Mid-America Coalition on Health Care
Florida Alliance for Healthcare Value	Midwest Business Group on Health
Great Philadelphia Business Coalition on Health	Nevada BGH/Nevada Health Partners
HealthCare 21 Business Coalition	Pacific Business Group on Health

## Partial list our 1400+ Signing Members:

Abbvie(\$)	Association of Community Cancer Centers (ACCC)	Campbell's Pharmacy
Abington Jefferson Health	Atlantic Health System	Cantu's Pharmacy
Accenture	Atrium Health	Capacity Strategies
ActiveRADAR, Inc.	Auburn University, Harrison School of Pharmacy	Capita Consulting
Advanced Primary Care Strategies	Aurum Diagnostics, LLC	Capitol Advocacy & Government Affairs, LLC
Advocacy Options LLC	Avalon Behavioral Health Solutions, LLC	Capstone Healthcare Alliance
Advocate Medical Group and Midwestern University	Avera Health	Cardiomedix
AegisOne Rx	Avera Heart Hospital	Cardiovascular Services
Affinia Health Network	Avera Institute for Human Genetics	Care Accountability Inc.
Albany College of Pharmacy and Health Sciences	Avera McKennan Hospital	Caretuit
Aledade	Ballad Health	Carilion Giles Community Hospital
All In Solutions	Baptist Health	Catalyst Enterprises LLC
Allergy & Asthma Network	Baptist Health Louisville	Catholic Health Services of Long Island
Allergy Partners	Baptist Medical Center Jacksonville	CB Pharmacy Consulting, LLC
Alliance for Integrated Medication Management	Baylor University Medical Center	CCI consulting
American Academy of Family Physicians (AAFP)	Belmont University College of Pharmacy	CDC via IHRC
American Association of Colleges of Pharmacy (AACCP)(§)	Benefis Health System	CDPHP
American College of Clinical Pharmacy (ACCP)(†)	Beth Israel Lahey Health	Cedars-Sinai
American Society of Health-System Pharmacists (ASHP)(†)	BetterMyMeds	Centene
Ameshi Management Service Inc.	Beverly Hills Institute for Precision Medicine	Central Care & Anti-Aging Center for Medication Optimization
Amgen(\$)	Bingo Dynamic Lifesaver	Center for Quality Medication Management at the University of Florida
Anchor Medical	Biopharma Advisors	Chapman University School of Pharmacy
Antaeon	BJC Medical Group & ACO	CHC Health
Apexus	Blue Thorn Inc	CHES Health Solutions
APhA	Board of Pharmacy Specialties	Chicago College of Pharmacy, Midwestern University
Apple Discount Drugs	Boston Medical Center	Children's of Alabama
APRx	Breast Cancer Index(\$)	Children's Health
Aramark	Brigham and Women's Hospital	Chiro To Go
Arcuris Consulting	BRKINS	CHRISTUS Health
ArdentCare Solutions	BT Pharmacy Consulting LLC	CHWP
Arine	Butler University, College of Pharmacy & Health Sciences	Cisco Systems, Inc.
Arxcel	California Chronic Care Coalition(*)	City Dermatology and Laser
AscellaHealth	California Society of Health System Pharmacists	Cleveland Clinic Main Campus
Ascension Medical Group	Carekinesis	Clinical and Translational Genome Research Institute of Southern California
Ascension Seton		University of Health Sciences

Clinical Pharmacy Systems  
Inc  
Collaborative Rx Outcomes  
LLC  
College of Pharmacy, Qatar  
University  
College of Psychiatric and  
Neurologic Pharmacists  
Colorado Pharmacists Society  
Communication Prescription,  
LLC  
Community Health and  
Wellness Partners  
Community Health Network  
Consana LLC  
Consult A Pharmacist, LLC  
Coriell Life Sciences  
CPESN Iowa  
CPS Telepharmacy  
CrossBridge Health  
CSS Health  
CURA Strategies  
Cureatr  
Custom Design Benefits  
CVS  
CXJ Consulting  
Dallas-Fort Worth Business  
Group on Health  
Davie's Community Hospital  
DCH Health System  
Deaconess Hospital  
Department of Veterans  
Affairs(\*)  
Desert Oasis Healthcare  
Diamond S Ranch  
Digital Health Space  
Doylestown Health  
Drake University  
DRx Consulting LLC  
Duke-Margolis Center for  
Health Policy  
Duke University Health  
System  
e.neves Consultoria  
East Tennessee State  
University Academic Health  
Sciences Center / College of  
Pharmacy  
Eastern State Hospital

Eccrine Systems, Inc  
eHealth Initiative  
Elder Care Pharmacy  
Consultants, LLC  
Elite Pharmacy Consulting,  
LLC  
Elon University  
Emerging Therapies  
Solutions  
Emerson Hospital  
Employers' Advanced  
Cooperative on Healthcare  
Ensign Services  
Entree Health  
Envision Genomics  
ePharma PBM do Brasil SA  
Epic  
Everyone Matters, Inc.  
Excelicare  
Executive Kings, Inc.  
Executive Pharmacy  
Consulting Services, Inc  
Fairleigh Dickinson University  
School of Pharmacy & Health  
Sciences  
Fairview Pharmacy Services  
FAWKS Company  
Federal Medical Centre,  
Makurdi  
Ferris State University COP  
First Databank  
First Impact  
Florida Alliance for  
Healthcare Value  
Fortech  
Franciscan Health  
Fresenius Medical Care  
Fronledge HC  
Gateway Health Plan  
Geisinger Health System  
GenelQ  
Genentech(\$)  
Genet-Rx  
Genome Creative  
GenXys Health Care Systems  
GeriatRx  
Geritom Medical  
Ghost Systems, Inc.  
Global Health Care, LLC

Global Health Strategies  
Gold Strike Findings  
Grand Valley State  
University, Physician  
Assistant Studies  
Greater Philadelphia  
Business Coalition on Health  
Gynecologic Care with Janice  
Lyon MD SC  
Great Plains QIN  
Harding University College of  
Pharmacy  
Harps Food Stores, Inc.  
Health Care Education and  
Training, Inc.  
Health Intelligence Partners  
Health2 Resources  
Healthcare 21 (H21)  
Healthcare Quality Strategies  
Inc.  
HealthPartners Institute  
HealthTeamWorks  
Hematology-Oncology  
Associates of CNY (HOA)  
HG Pharmacist  
HIE of One  
High Point University  
Highland Hospital  
High Touch Health  
Hillside Chronic Care  
Management  
Hinsdale Pharmacy  
Associates, Inc.  
Hinshaw & Associates  
Houston Methodist Health  
System  
HVH Analytics  
IBM Watson Health  
Idaho State University  
IDDI  
i-Health  
Illinois Pharmacists  
Association  
Illuminate Health  
Independent Colleges and  
Universities Benefits  
Association, Inc.  
Indiana University Health  
Indian Health Service

Indian Pharmaceutical Association  
inGENEious RX  
Innovaccer  
InnovaRx  
Innovative Healthcare Consulting  
Innovatix  
InsightGx LLC  
Inspira Health  
INTEGRIS Medical Group  
Invitae  
Iowa Healthcare Collaborative  
IPhA-PSMP  
IPRO  
Isetts Consulting, LLC  
ITSAN – International Topical Steroid Awareness Network  
IU Health  
J&J(+)  
Jerry H. Hodge School of Pharmacy Texas Tech University Health Sciences Center  
JPS Health Network  
Just Better Medicine Pharmacy Solutions  
Kailos Genetics, Inc.  
Kaiser Permanente(\*)  
Kaiser Permanente Colorado  
Kelly Diabetes Associates, LLC  
Kennedy Pharmacy Innovation Center, UofSC  
College of Pharmacy  
Kevin Marvin Consulting LLC  
Labcorp(\$)  
Laboratory Medicine and Pathology Advisors  
Lantana Pharmacy  
Larkin University College of Pharmacy  
Laurel Senior Living Communities  
Lipscomb University College of Pharmacy  
Loma Linda University, School of Pharmacy

Lee Health  
Luminus Diagnostics  
Lehigh Valley Health Network  
Main at Locust Pharmacy and Medical Supplies  
Managed Healthcare Resources, Inc.  
Manatee Memorial Hospital  
Manchester University  
Mann-Grandstaff Veterans Affairs Medical Center  
Marie Savard, MD  
Massachusetts College of Pharmacy and Health Science  
Matheus BD Connections, LLC  
MCG  
McQuone Consulting  
MD Resources  
MedAllies  
MedAware  
MedCentre PLLC  
Medical Risk Managers  
Medication Call Reminder  
MedicationXpert, corp.  
Medigenics Consulting LLC  
Medisafe  
MediSync  
Medplus Solutions  
MedsPLUS Consulting  
MedTek21 Solutions  
MedWatchers  
Mercer University College of Pharmacy  
Mercy Health  
Mercyone Waterloo Medical Center  
Mid-America Coalition on Health Care  
Midwest Business Group on Health  
Midwestern University  
Glendale College of Pharmacy  
Missouri Pharmacogenomics Consulting  
Mobile MediClaim, Inc.  
ModRN Health

Monument Health, LLC  
MorningStar Actuarial Consulting, LLC  
Mountain Area Health Education Center  
Mountain Health CO-OP  
MyMeds  
Nasr City Cancer Center  
National Alliance of Healthcare Purchaser Coalitions(\$)  
National Hemophilia Foundation  
National Pharmaceutical Council  
Navigant, Inc  
Nebraska Medicine  
Nevada Business Group on Health  
New Directions Behavioral Health, LLC  
New Directions Technology Consulting, LLC  
NewHealth Collaborative;  
Summa Health  
New Jersey Poison Information and Education Services  
Nokomis Fiduciary  
Northeastern University School of Pharmacy  
Northeast Ohio Medical University  
Novant Health  
Nurse Advocate  
NYC Health + Hospitals/  
Gotham Health  
OCAPS  
Ohio College of Clinical Pharmacy Advocacy Committee  
Omicare  
Omniceil  
On Call Healthcare LLC  
OneOme(\$)  
OnlyYOU®  
Options MD  
Optum Health Services

Orange Regional Medical Center  
OYES LLC  
Pacific Business Group on Health  
Pacific University Oregon School of Pharmacy  
Palm Beach Atlantic University, School of Pharmacy  
Panacea BioMatx, Inc  
Park Nicollet Health Services  
Parker Adventist Hospital  
Partners Pharmacy  
Penn Presbyterian Medical Center  
Perfect Planet, LLC.  
Pharma-Care, Inc.  
Pharmaceutical Care Options, LLC  
PharmaLead Consulting  
Pharmazam, LLC  
PharmD Live  
PharmEcology Services, WMSS  
PharMerica  
Physician Health Partners  
PIH Health Hospital – Downey  
PipelineRx  
Pittsburgh Business Group on Health  
Point-of-Care Partners  
Prefeitura Municipal de Belo Horizonte  
Preventive Plus  
Prisma Health  
Proactive Health, Atrium  
Psychopharm Solutions LLC  
PTS Diagnostics  
QRxConsults LLC  
Quality Community Health Care  
Quest Diagnostics(†)  
QuickSTAT  
Reed Family Pharmacy  
Reengineering Cancer  
Treatm

Regenstrief Center for Healthcare Engineering  
Retirement Wellness Strategies  
Rexall Pharmacy Group, Inc  
RHA Health Services  
Ritu Suri MD LLC  
Riverside University Health System  
RiverStone Health  
Rochester Regional Health  
Rocky Mountain Health Plans  
Roosevelt University  
Rosalind Franklin University  
Roseman University  
RPRD Diagnostics  
Rutgers Pharmacy & Henry J. Austin Health Center  
rx-Consultant, LLC  
RxResults  
Saba and Associates, LLC  
Salt Lake City Medical Center  
San Antonio Regional Hospital  
Sanford Health  
Santiam Hospital  
Santosh Health  
Sarasota Memorial Hospital  
ScalaMed  
SCAN Health Plan  
Scipher Medicine  
Scripta Insights  
Signature Diabetes Institute (SDI)  
Simplicity Pharmacy Services and Wellness Center Inc  
Siouxland Community Health Center  
SOHO Health  
South College School of Pharmacy  
South Dakota State University  
Southwest General  
Southwest Montana Community Health Center  
Spartanburg Regional Healthcare System  
St. Bernards Hospital, Inc.

St. Christopher's Hospital for Children  
St. Johns University, Long Island University  
St. Louis College of Pharmacy  
St. Luke's Rehabilitation Institute  
St. Mary Medical Center  
Steward Healthcare  
Stroke Association Support Network – Ghana  
SyneRxgy Consulting, LLC  
Tabula Rasa Health Care(\*)  
Teachers' Retirement System of Kentucky(\$)  
TeleMedik  
Texas A&M Rural and Community Health Institute  
Texas A&M University HSC College of Medicine, A&M Rural and Community Health Institute  
Texas Business Group on Health  
Texas Tech University Health Sciences Center Jerry H. Hodge School of Pharmacy  
TFG Partners, LLC  
The FIT PharmD  
The John Hopkins Hospital  
The Johns Hopkins Health System  
The Journal of Precision Medicine(\$)  
The Kimber Boothe Group, LLC(\$)  
The Sab Group  
The Virtual Nephrologist, INC.  
Therapy in your home – OT  
PT ST  
Thermo Fisher Scientific  
TLJ Health  
TMAccelerator  
Towncrest Pharmacy  
Tria Health  
Trinity Clinical Pharmacy Services



TriStar Summit Medical Center  
TrustCare Health  
TS Consulting Services  
Umm Al-Qura University  
UNC Eshelman School of Pharmacy, Center for Medication Optimization  
UnitedHealthcare  
Universidade Federal de Minas Gerais  
University at Buffalo  
University of California Irvine  
University of California San Diego  
University of California San Francisco  
University of Chicago Medicine  
University of Cincinnati College of Pharmacy  
University of Colorado  
University of Connecticut School of Pharmacy  
University of Florida College of Pharmacy  
University of Georgia College of Pharmacy  
University of Hawaii at Hilo; Hawaii Island Family Health Center  
University of Illinois at Chicago College of Pharmacy  
University of Iowa Hospitals & Clinics  
University of Jordan Hospital  
University of Kansas  
University of Kentucky  
University of Maryland  
University of Maryland Quality Care Network

University of Medicine Mandalay  
University of Minnesota  
University of Mississippi School of Pharmacy  
University of Missouri Kansas City School of Pharmacy  
University of Nevada School of Medicine  
University of New Mexico College of Pharmacy  
University of North Texas Health Science Center  
University of Rochester Medical Center  
University of South Australia  
University of South Carolina  
University of Texas at Austin College of Pharmacy, Pharmacotherapy Division  
University of Texas Rio Grande Valley  
University of Utah College of Pharmacy  
University of Tennessee Health Science Center College of Pharmacy  
UPMC Western Maryland University School of Pharmacy  
Uptown Pharmacy  
USAID  
UTHealth McGovern Medical School  
VA Medical Center  
Vanderbilt University Medical Center  
Vigilance Health Inc.  
Vintage Consulting  
Virginia Commonwealth University

Visante, Inc  
Vizient  
Vulcan Enterprises LLC  
Walgreens  
Walmart  
WardRx Consulting  
Washington State University College of Pharmacy & Pharmaceutical Sciences  
Watermark Counseling LLC  
Watson International Consulting LLC  
Wayne State University College of Pharmacy  
Webster & Associates, LLC  
WellScriptEd Consulting Inc.  
WellWaze, Inc.  
Wentworth-Douglas Hospital  
Wesley Healthcare Systems  
West Coast University  
Western University of Health Sciences, College of Pharmacy  
WeWa.life LLC  
Wilkes University  
William Carey University School of Pharmacy  
William Jones RPh, LLC  
Williamsburg Endocrinology, Inc  
WilsonValue Drug Store  
Wolfe's Pharmacy  
Wolters Kluwer Health  
W Triplett Consulting LLC  
Xavier University of Louisiana College of Pharmacy  
Xeris Pharmaceuticals  
YouScript  
Zigna Analytics  
Züp Medical Services