



July 2, 2024

SENT VIA EMAIL

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC 20201

Re: Medicare Drug Price Negotiation Program: Draft Guidance, Implementation of Sections 1191 – 1198 of the Social Security Act for Initial Price Applicability Year 2027 and Manufacturer Effectuation of the Maximum Fair Price (MFP) in 2026 and 2027

Dear Administrator Brooks-LaSure:

Aimed Alliance is a not-for-profit health policy organization that seeks to protect and enhance the rights of healthcare consumers and providers. We appreciate the opportunity to provide feedback on the Medicare Drug Price Negotiation Program and applaud CMS for its commitment to actively engage patients, caregivers and providers throughout the implementation of the IRA. Aimed Alliance urges CMS to consider the following recommendations to ensure the listening sessions are genuine, inclusive, and effective.

I. Introduction

While we appreciate the inclusion of patient listening sessions in the negotiations, there are a few areas we suggest addressing to ensure future success. Previous sessions were marked by strict time requirements and a lack of guidance, which likely hindered participants' ability to provide meaningful and relevant contributions. Additionally, there was a lack of diversity, which may have resulted in a limited range of perspectives being considered. Furthermore, all listening session spots were not filled, indicating a potential lack of awareness among stakeholders of these opportunities. Addressing these issues is crucial to ensuring that future listening sessions are more inclusive, genuine, and fully attended, thereby enriching the quality of feedback and fostering a more comprehensive understanding of patients' needs and concerns.

II. Guidance on Listening Sessions

To ensure that listening sessions are beneficial to CMS, it is essential to provide clear guidance on the types of information that are most useful to CMS. This guidance should outline the specific objectives of the listening sessions, clarify the type of feedback CMS is seeking, and explain how this feedback will be utilized in decision-making processes. Such clarity will enable participants to tailor their contributions effectively to meet CMS's needs, fostering more productive and focused discussions.



III. Promoting Diversity Through Varied Times and Formats

To promote diversity and inclusivity in participation, we recommend offering listening sessions at various times and in different formats, while also permitting the submission of pre-recorded materials. This approach will accommodate the schedules of a wider range of participants, including patients, caregivers, providers, and health data experts. This will also help ensure those with childcare, caregiving, or other responsibilities can share their comments and experiences with CMS.

Additionally, we support CMS's consideration of interactive sessions that encourage discussion and allow CMS to ask clarifying questions, rather than hosting listen-only events. We also support combining events for medications that treat similar conditions or diseases, rather than holding separate events for each drug. Providing a variety of session formats will help maximize participation, ensure that a broader spectrum of voices are heard, and facilitate a more comprehensive exchange of ideas.

IV. Allowing Patient Advocates to Speak

We strongly encourage CMS to allow patient advocates to speak on behalf of their respective disease communities. Many patients may find it difficult to speak out about their personal health issues due to stigma, emotional distress, or other barriers. Patient advocates, and advocacy organizations, are well-versed in the challenges and needs of their communities which can provide valuable insights and articulate the collective experiences and concerns of patients. This approach can enhance the quality of the feedback CMS receives and ensure that the perspectives of those most affected by the issues are adequately represented, while also preventing the burden of providing these insights from falling solely on individual patients.

V. Conclusion

We support CMS's efforts to engage with stakeholders for the successful implementation of the IRA. We appreciate the opportunity to provide input on this matter and look forward to participating in listening sessions that are genuine, inclusive, and effective in gathering valuable feedback to inform healthcare decisions.

Thank you for considering our comments.

Sincerely,

Ashira Vantrees
Counsel