



January 15, 2018

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health & Human Services
7500 Security Boulevard
Baltimore, MD 21244

Re: Medicare Program; Contract Year 2019 Policy and Technical Changes to the Medicare Advantage, Medicare Cost Plan, Medicare Fee-for-Service, the Medicare Prescription Drug Benefit Programs, and the PACE Program (CMS-4182-P)

Dear Administrator Verma:

On behalf of American Pharmacy Cooperative, Inc., and in addition to our collaborative efforts with NCPA, we are pleased to submit comments and recommendations on the proposed rule, "Medicare Program; Contract Year 2019 Policy and Technical Changes to the Medicare Advantage, Medicare Cost Plan, Medicare Fee-for-Service, the Medicare Prescription Drug Benefit Programs, and the PACE Program (CMS-4182-P)."

Our organization strongly supports the proposed rule's suggestion to require that all pharmacy price concessions (pharmacy DIR fees) be reflected in the negotiated price at the point of sale. This approach will bring much needed transparency, improve the predictability of business operations for community pharmacists, and most importantly, lead to significant beneficiary savings.

We urge CMS to finalize this proposal in future rulemaking, while preserving and enhancing the extent to which plans employ performance-based programs with pharmacies that allow bonus payments for high performance.

We sincerely appreciate CMS' drive towards value and encourage the Agency to continue to partner with pharmacies as an integral part of achieving value-based healthcare that is driven by quality and performance.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Angie Shirley".

Angie Shirley
Director of Managed Care & Audit Prevention