



## Oncology Nursing Society

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January 15, 2018

Ms. Seema Verma, Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Room 445-G, Hubert H. Humphrey Building  
200 Independence Avenue, SW  
Washington, DC 20201  
*Submitted electronically via Regulations.gov*

**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 Program, and the PACE Program**

Dear Administrator Verma,

The Oncology Nursing Society (ONS) is writing to share sentiments on key provisions outlined in the Centers for Medicare and Medicaid Services (CMS) 2019 Medicare Advantage (MA) and Part D Prescription Drug plan proposed rule, and the impact on cancer care delivery and treatment to enrollees.

### Medicare Advantage and Part D Prescription Drug Plan Quality Rating System

ONS appreciates CMS' solicitation for feedback from stakeholders on how well the existing stars measures create meaningful quality improvement incentives and differentiate plans based on quality. CMS has expressed particular interest in receiving stakeholder feedback on additional opportunities to improve measures so that they further reflect the quality of health outcomes under the rated plans. To that end, ***we urge the agency to improve the Quality Rating System by adding new stars measures that focus on cancer care and delivery.*** ONS would be please to nominate oncology nurses to a CMS-convened technical expert panel (TEP) that would work toward the development of stars measures that would evaluate rated plans on cancer care and delivery, and related issues, which we believe would help beneficiaries select a plan that is right for them in the event of a cancer diagnosis.

CMS is also considering the inclusion of a survey of physician's experiences with rated plans. ***We urge CMS to consider a broader survey of "clinician experiences" and include nurses, such as oncology nurses.*** Oncology nurses are a critical provider of services to MA plan enrollees and face the same challenges as physicians with rated plans. We would appreciate the opportunity to provide feedback to MA plans as part of a survey.

### Request for Information Regarding the Application of Manufacturer Rebates and Pharmacy Price Concessions to Drug Prices at the Point of Sale

While many oncology medicines are reimbursed under Medicare Part B, there are some oral treatments reimbursed under Part D. Other medicines a cancer patient may need, such as oral anti-nausea medications, are also reimbursed under Part D. Given the large financial burden that a cancer diagnosis places on a family, ONS strongly supports any policy that reduces cost-sharing for our patients. A mandatory pass-through of price concessions would help alleviate some of the out-of-pocket burden without compromising patients' access to medicine. In addition, CMS' estimates that

a pass-through would save significant money for the government, as well. ***We strongly support CMS moving forward with a requirement for plans and their pharmacy benefit managers to pass through to beneficiaries 100% of the price concessions they negotiate from manufacturers and pharmacies.***

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ONS appreciates the opportunity to comment on these important issues, and we look forward to a continuing dialogue. If you have any questions about our comments, please contact Donna (Dede) Sweeney, ONS Director of Government Affairs, at [dsweeney@ons.org](mailto:dsweeney@ons.org).

Sincerely,

The Oncology Nursing Society

***About ONS***

The Oncology Nursing Society (ONS) is a professional organization of over 39,000 registered nurses and other healthcare providers dedicated to excellence in patient care, education, research, and administration in oncology nursing. ONS members are a diverse group of professionals who represent a variety of professional roles, practice settings, and subspecialty practice areas. Oncology nurses are leaders in the healthcare arena, committed to continuous learning and leading the transformation of cancer care by advocating for high-quality care for people with cancer.