

RetireSafe

Standing Up For America's Seniors!

January 16, 2018

Ms. Seema Verma
Administrator
Centers for Medicare & Medicaid Services
7500 Security Blvd.
Baltimore, Maryland 21244

Re: RetireSafe comments concerning 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 (file code CMS-4182-P)

Dear Administrator Verma,

RetireSafe and its 200,000, nationwide, supporters and email activists appreciate the opportunity to comment on the proposed changes for 2019. We have signed onto other comment letters that reviewed and offered suggestions on some aspects of the proposed changes, specifically:

- Midyear formulary changes
- The treatment of Tiering exceptions
- The timing of plan marketing communication
- Changes to the Star rating program

We hope that the comments in these areas receive your attention and consideration. These changes will have an impact on the health and well-being of older Americans.

RetireSafe's comments to CMS-4182-P will focus on one very important proposal contained in the CMS document, the request for information concerning rebates at the point-of-sale.

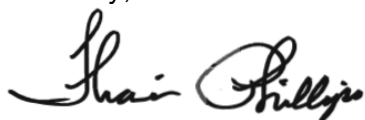
We are encouraged that CMS is considering ways that the prescription drug discounts and rebates that are negotiated with manufacturers can get to the patient. We realize that the solution will not be easy but the request for information is a great first step to obtain input on how these point-of-sale discounts can be realized.

In the past, patients have often not benefited from these negotiated discounts and have even been punished by paying co-payments and co-insurance that have been based on inflated list prices. A solution that incentivizes everyone in the drug supply chain to pass on these discounts to the patient will not only be of an immediate benefit to the patient but may also slow down list price inflation.

We certainly don't have the answer, but we are confident that there are answers waiting to be submitted. RetireSafe will be eager to review the possible solutions and the eventual implementation of those solutions.

We again congratulate CMS on taking this first step and stand by to help in any way we can.

Sincerely,



Thair Phillips
President/CEO
RetireSafe