

March 11, 2022

The Honorable Brad Wenstrup, D.P.M.
U.S. House of Representatives

The Honorable John Joyce, M.D.
U.S. House of Representatives

The Honorable Bruce Westerman
U.S. House of Representatives

Dear Members of the Republican Healthy Future Task Force Subcommittee on Treatments:

As the leading voice for in-office and freestanding infusion providers, the Infusion Providers Alliance (IPA) is pleased to provide comments to the Republican Healthy Future Task Force Subcommittee on Treatments. Among IPA's goals is educating policy makers on issues critical to safeguarding, supporting, and strengthening provider directed, patient-focused access to infusion services.

Goal #1 of the Subcommittee -- Evaluate potential innovative payment solutions for expensive curative therapies in Medicare and Medicaid -- asks the question "what other policies should we consider to lower costs while maintaining access to lifesaving cures?"

Although the Medicare Part D drug benefit includes a catastrophic benefit, beneficiaries have unlimited out-of-pocket exposure in Medicare Part B with the 20% coinsurance. While many beneficiaries have wrap around coverage from their former employer plans or from Medigap, others are left with unlimited and substantial out-of-pocket exposure. These Part B drugs, which can be very expensive and often have few therapeutic alternatives, are critical for patients as they manage their complex chronic diseases. Moreover, unlike many lifestyle medications, the treatment regimen for these Part B drugs is tightly defined and lack of adherence can result in hospitalization. As such, IPA supports two options to assist beneficiaries; these options can work independently or in tandem:

- Create a safe harbor from the anti-kickback statute to permit manufacturers of Part B drugs to provide cost-sharing assistance to Medicare patients; and
- Provide a statutory cap for Medicare Part B drugs equal to the hospital inpatient deductible (\$1,484).

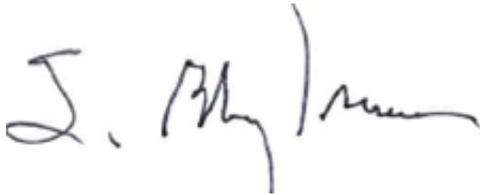
Conclusion

There is no single remedy to encouraging more competition in the provider sector, but government can take important, targeted steps to ensure patient access and viability for multiple sites of care. The Medicare program and its tens of millions of Medicare beneficiaries will benefit from thoughtful changes and improvements to the system by increasing access to more affordable health care. We stand ready to work with you and Members of both parties on these ideas.

Sincerely,



Doug Ghertner
President
Infusion Providers Alliance



Brad Traverse
Executive Director
Infusion Provider Alliance
Brad.Traverse@infusionprovidersalliance.org