



National Association of Nutrition and Aging Services Programs

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Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244

Jonathan Blum
Principal Deputy Administrator and Chief Operating Officer
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244

Dear Administrator Brooks-LaSure and Mr. Blum,

As Executive Director of the National Association of Nutrition and Aging Services Programs (NANASP), along with the undersigned groups below write to commend you and CMS for taking a proactive stance with your communication to members of the insurance industry on December 14th of last year. We are writing on behalf of millions of older Americans as well as patients from across the country to advance policies that support their well-being of and advocate for removing barriers that impede it. You raised concerns about certain practices by some plans and pharmacy benefit managers that threaten the viability of pharmacies, impede access to care and put increased burden on health care providers. We most certainly share your concerns.

Ensuring access to innovative and effective vaccines is a top priority and one we have remained committed to advancing given the real benefits they offer in preventing serious health outcomes in older Americans and those adults living at greater risk of illness.

Long before the pandemic, we routinely encouraged vaccination against the many diseases that impact older Americans. Respiratory illnesses are of particular concern to the population

we serve. As you know, COVID impacted older adults the most, with higher rates of hospitalizations and deaths. Other respiratory illnesses like the flu, RSV and pneumonia also infect and impact older adults at higher rates than the rest of the population, accounting for hundreds of thousands of hospitalizations each year.

The potential access concerns regarding vaccines and treatments that can prevent and treat respiratory illnesses like COVID, flu and RSV highlighted in your letter are beyond worrisome on two levels. As we saw during COVID, and in the day-to-day lives of the individuals we serve, pharmacists play an increasingly critical role in the healthcare of patients of all ages, especially older adults. Pharmacies are often more accessible than the primary care office and many pharmacists see their customers far more often than other clinicians, allowing older adults more opportunity and more “face time” to develop a comfort level and ask questions.

Access barriers at pharmacies such as prior authorizations interrupt this very important relationship, hampering choice and thus reducing the number of patients of all ages receiving needed services.

Already, pharmacies are raising the flag about unnecessary hurdles being placed upon them and some can no longer offer vaccines to their customers as they are actually losing money on administering them. This will inevitably result in even lower uptake of vaccines by the vulnerable Americans we should be most concerned about protecting during the next respiratory disease season. While we are grateful to be living in a time when there are more and better protective tools than ever before to preserve the health and well-being of all generations, we simply cannot continue to put hurdles in front of those protections. A vaccine is only useful when it is administered to a patient.

CMS is right in taking the position you have, and we support your action on behalf of all patients and would be supportive of any reinforcing of your position as needed.

We will continue to urge our healthcare leaders to work to make access to vaccinations easier, not more of a challenge and we urge CMS to continue to monitor these issues and be vigilant in taking action with the insurance industry if warranted.

Too many lives will be at risk if we don't get this right.

Sincerely,

Alliance for Aging Research
American Society of Consultant Pharmacists

California Chronic Care Coalition
Caregiver Action Network
Chronic Care Policy Alliance
Generations United
Gerontological Society of America
HealthHIV
Healthy Men Inc.
HealthyWomen
Lupus and Allied Diseases Association, Inc.
National Alliance for Caregiving
National Association of Nutrition and Aging Services Programs
National Caucus and Center on Black Aging
National Consumers League
National Council on Aging
National Foundation for Infectious Diseases
National Hispanic Council on Aging
Nevada Chronic Care Collaborative
Retire Safe
StopAfib.org/American Foundation for Women's Health
Women's Institute for a Secure Retirement