

January 26, 2017

The Honorable Mitch McConnell  
Majority Leader  
United States Senate  
S-230, US Capitol  
Washington, DC 20510

The Honorable Charles Schumer  
Minority Leader  
United States Senate  
S-221, US Capitol  
Washington, DC 20510

The Honorable Paul Ryan  
Speaker  
House of Representatives  
Office of the Speaker  
H-232, US Capitol  
Washington, DC 20515

The Honorable Nancy Pelosi  
Democratic Leader  
House of Representatives  
Office of the Democratic Leader  
H-204, US Capitol  
Washington, DC 20515

Dear Majority Leader McConnell, Minority Leader Schumer, Speaker Ryan and Leader Pelosi:

The undersigned organizations write to request quick action in 2017 to ensure Medicare beneficiaries have access to Part B Durable Medicare Equipment (DME) home infusion services, equipment and drugs. Provisions included in *The 21<sup>st</sup> Century Cures Act*, implementation of Average Sales Price (ASP) for Part B DME infusion drugs in January of 2017 with a delay in payment for the necessary home infusion services to safely administer these drugs until January of 2021, create a high probability of reducing beneficiary access to these critical therapies.

Any change in Part B DME drug reimbursement should be simultaneously implemented with a payment for home infusion services. The disconnect of these two payment provisions in *The 21<sup>st</sup> Century Cures Act* would create a four-year gap between the implementation of ASP and the implementation of the infusion services payment. This four-year gap needs to be closed to ensure beneficiaries have access to the critical drugs that are provided under the Medicare Part B DME benefit.

While several therapies are impacted by this change, two are dramatically affected - inotropic therapy for heart failure and subcutaneous immunoglobulin therapy for primary immunodeficiency diseases. Due to the required shift in drug reimbursement without an infusion services payment for four years, Medicare emergency department, hospital, and infusion costs may increase for this population of beneficiaries. In some cases beneficiaries may have no site of care available for their lifesaving infusions. Beneficiaries will suffer and be put at risk for even more complicated and costly health problems. For decades, home infusion has been used by Medicare and the private sector to deliver lifesaving treatments to patients without increased costs, infection risks, hospitalizations and hospital readmissions. This would be a step back from the stated goals of Congress to provide low cost, high quality care in the Medicare program.

We request that Congress move early in 2017 to ALIGN the effective dates of ASP reimbursement for Part B DME infusion drugs and the infusion services payment (Section 5004(a) and Section 5012 of *The 21<sup>st</sup> Century Cures Act*).

Sincerely,

1st America Infusion Services LLC  
Access IV Sacramento, division of Briova Specialty Infusion  
Advanced Care  
Advanced Home Care  
Advanced Home Care Services West Inc.

Advocate Health Care  
Affinity Home Care Plus  
Altruistix Nursing Services, Inc.  
Ambient Healthcare  
American Academy of Allergy, Asthma & Immunology  
American Association for Homecare  
American Association of Heart Failure Nurses  
American Medical Direct  
American Outcomes Management, LP  
American Society of Consultant Pharmacists  
American Society for Parenteral and Enteral Nutrition  
American Society of Transplantation  
Apple Infusion, Inc.  
ARJ Infusion Services  
Association for Vascular Access  
At Home Infusion Services  
AxelaCare  
Banner Health  
Barnes Healthcare Services  
Baystate Home Infusion & Respiratory Services  
Best Option Healthcare  
Big Sky I.V. Care of Montana  
BioScrip  
Boston Home Infusion  
Brooks Health Care  
C.A.I.S. Inc.  
Cardiac Infusion Specialists  
Cardiovascular Consultants  
CarePro Health Services  
Carter Healthcare, LLC  
Chartwell Midwest Wisconsin  
Chartwell Pennsylvania, LP  
CHI Health at Home  
Cleveland Clinic Home Infusion Pharmacy  
Clinical Immunology Society  
Clinical Resources Inc.  
Clinical Specialties Inc.  
Community Home Infusion  
Complete Infusion Services  
Compounding Pharmacy Solutions  
ComSult Enterprises, LLC  
Concept Medical Inc.  
Continuum Home Health/University of Virginia Health System  
ContinuumRx Services, Inc.  
CSL Behring  
Druid City Vital Care  
EMED Technologies Corporation  
Florida Hospital Home Infusion, LLP  
Focus Rx Pharmacy Services Inc.  
Fox Hills Pharmacy, Inc.  
GBS|CIDP Foundation International  
Genesis FirstMed Pharmacy

Gracious Heart Nursing Services, LLC  
Grifols  
Health & Wellness Compounding Pharmacy  
Healthwise Pharmacy of Greenville, Inc.  
Heart Failure Society of America  
Heartland I.V. Care  
Henry Ford Home Infusion  
HICAP, Inc. A Medicare Consulting Service  
Hobbs Pharmacy  
Holly Hill Pharmacy & Infusion Services  
Home Health United Xtra Care Pharmacy  
Home I.V. Specialists, Inc.  
Home Infusion Group, Inc.  
Home Infusion Therapy Specialists, LLC  
Home Medical Equipment Specialists  
Home Parenteral Services  
Horizon Healthcare Services  
Immune Deficiency Foundation  
InfuCare, Ltd.  
Infusion Associates  
Infusion Care of Delaware, LLC  
Infusion Nurses Society  
Infusion Solutions Inc.  
Infusion, LLC  
InfuSystem, Inc.  
Innovatix, LLC  
Integrated Medical Systems, Inc.  
Intramed Plus Infusion Services  
IV Services, LLC  
Johns Hopkins Health System  
Kabafusion Infusion Pharmacies  
Kaup Pharmacy, Inc  
Kedrion Biopharma  
Lakeland Home Infusion  
Lancos Consulting  
Las Vegas Infusion Pharmacy  
Legacy Health  
Mahoning Valley Infusion Care  
Managed Health Care Associates, Inc.  
marcstranz, Inc.  
MDS, LLC  
Medical Accounts Receivable Solutions, Inc.  
Medical Alternatives  
Medical City Dallas Heart Failure Clinic  
Medical Specialties Distributors  
Medilink Homecare  
Medi-Quip, Inc.  
Mediware Information Systems, Inc.  
Mediware Reimbursement Services, LLC  
Methodist Home Health and Hospice  
MiIVRx  
Ministry Home Care Plus, Marshfield WI

Moog Medical Device Group  
Munson Home Infusion Pharmacy  
National Association of Specialty Pharmacy  
National Community Pharmacists Association  
National Home Infusion Association  
NBN Infusions, Inc.  
New England Life Care  
Northwestern Memorial HealthCare  
NPHC  
NuCara Infusion Services  
Oakstead Infusion Pharmacy, LLC  
One Source Homecare  
Option Care  
OptionOne Pharmacy  
Owens Healthcare  
Paragon Healthcare, Inc.  
Paragon Ventures  
Park Nicollet Home Infusion  
Partners In Home Care, Inc.  
Patient Care America  
PeaceHealth Sacred Heart Home Infusion  
Pediatric Home Service  
Pharmacare Hawaii, Inc.  
Pharmacare Health Specialists  
PharmaScript Inc.  
PharMerica  
PiPunited  
Preferred Providers, Inc.  
Premier Infusion Care  
Premier Nursing Group  
Prescription Center Homecare, Inc.  
Professional Home IV  
Professional Reimbursement Inc.  
Profusion, LLC  
ProMedica Home Infusion Pharmacy  
PromptCare Home Infusion  
Provista  
Pulmonary Hypertension Association  
Qualitas Pharmacy services  
Redline Specialty Pharmacy  
Rush Home Infusion Solutions  
Sartin's Vital Care Inc.  
SBH Medical, LTD  
Sentara Home Infusion Pharmacy Services  
Shire  
Simfarose Pharmacy  
Smiths Medical  
Soleo Health  
Spartanburg Regional Healthcare System  
Spectrum Infusion, Inc.  
Sterling Pharmacy  
Summa Health Home Infusion

SwedishAmerican Infusion Services  
TANYR Health Care, LLC  
The Consortium of Independent Immunology Clinics  
Thomas Jefferson University Hospitals  
UCSD Home Infusion Pharmacy  
University of Chicago Medicine  
University of Iowa Community HomeCare  
University of Maryland Medical Solutions Home Infusion  
Valmed Home Health & Pharmacy Solutions  
Vanderbilt Home Care Services  
VGM Group  
Via Christi Home Medical Infusion Pharmacy  
Vital Care Compounder  
Vital Care, Inc.  
Vizient  
Walgreen Co.  
Wargo & Associates, LLC

cc: Chairman Orrin Hatch, Senate Finance Committee  
Ranking Member Ron Wyden, Senate Finance Committee  
Chairman Lamar Alexander, Senate Health, Education, Labor and Pensions Committee  
Ranking Member Patty Murray, Senate Health, Education, Labor and Pensions Committee  
Chairman Greg Walden, House Energy and Commerce Committee  
Ranking Member Frank Pallone, House Energy and Commerce Committee  
Chairman Kevin Brady, House Ways and Means Committee  
Ranking Member Richard Neal, House Ways and Means Committee