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CMS interim final rule falls short for home infusion

Alexandria, Va. (April 3, 2020) — The National Home Infusion Association (NHIA) has been engaging with members and stakeholders regarding the impacts to home infusion from the Centers for Medicare and Medicaid Services’ (CMS) interim final rule published in response to the COVID-19 public health emergency.

While we are encouraged that CMS is acknowledging the need for broader access to infused drugs that are currently delivered across various settings, NHIA fails to see how relaxing physician supervision through the use of telecommunications technology, or broadening clinical indications for the limited number of Part B DMEPOS drugs, will generate significant access to home infusion for seniors who need to avoid being exposed to coronavirus.

Some physicians may have the time, resources, and relationships to extend their services to the home through real-time audio and video means, but the vast majority will not. In our view, the CMS interim final rule does not establish a practical path forward for the thousands of patients who depend on IV therapies to manage their clinical conditions at home.

NHIA believes strongly that the barriers to accessing home infusion for Medicare patients can be removed by establishing a comprehensive, bundled payment for professional services, supplies, and equipment — similar to the commercial payer model — that is paid to home infusion providers for each day of infusion. Prescribers routinely delegate the coordination of home infusion services to specially trained pharmacists and nurses, who practice at the top of their license, to support patients needing a wide range of infused therapies.

CMS should move quickly to leverage the expertise and capacity of these clinicians and help Medicare beneficiaries obtain the medications they desperately need, without having to risk exposure to COVID-19.

“Now more than ever we need practical solutions based on proven methodologies to create home infusion access,” said NHIA President & CEO Connie Sullivan, BSPharm. “This rule will not relieve the burden facing health systems or provide viable alternatives for seniors seeking
access to home-based care. We urge CMS to continue working toward strategies that can be quickly implemented, such as those used in the private-sector."

NHIA is a trade association that represents companies that provide infusion therapy to patients in their homes, as well as companies that manufacture and supply infusion and specialty pharmacy products. Infusion therapy involves patient-specific compounded medications, supplies, and a range of pharmacy, nursing, and other clinical services for delivering care to patients in the home setting. For more information, visit www.nhia.org.

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