

September 7, 2021

The Honorable Chiquita Brooks-LaSure
Administrator, Centers of Medicare & Medicaid Services
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dear Administrator Brooks-LaSure:

Subject: Urgent Action needed so millions of Medicare beneficiaries preserve their equitable access to lower cost insulin under the Biden Administration.

Issue: CMS removed the way beneficiaries search for enhanced coverage for insulin in Part D in Medicare Plan Finder. Advocacy organizations, pharmaceutical manufacturers, plan sponsors, and beneficiaries worked with CMS to successfully implement the Part D Senior Savings Model in 2020. Changes that CMS made to the Medicare Plan Finder, without stakeholder input, appear to nullify all of the work put into educating beneficiaries that use insulin on how to find a plan with enhanced insulin coverage. While likely this is not CMS's intent, the consequences are nonetheless the same and real: higher cost insulin and greater health inequities for millions who take insulin.

Background: Cost-related medication underuse and abandonment of insulin has been the focus of multiple hearings in Congress, reports issued by the Senate Finance Committee and the Congressional Diabetes Caucus, and has been deemed a public health crisis by healthcare professionals and prominent news outlets. For those requiring insulin daily, the complexity of our current health system creates barriers to affordable and predictable out-of-pocket costs.

The Part D Senior Savings Model (PDSS), introduced for the 2021 plan year, was designed to examine the impact of affordable and stable monthly costs for insulin on Medicare beneficiaries short- and long-term health. The undersigned patient and health professional organizations applaud CMS and CMMI for this innovative effort as one of many important steps in ensuring this life-essential drug can be accessed and utilized.

With over 3.3 million beneficiaries requiring insulin daily for diabetes management, it is crucial that those newly eligible and those choosing plans during annual open enrollment know the Senior Savings Model is not only available, but can quickly review plans that will provide them with the \$35 monthly cost for each insulin prescription.

We were disheartened to learn that the filter for PDSS on the Medicare.gov Plan Finder was removed on August 19, 2021 with no intention of including that specific filter for the upcoming 2022 annual enrollment period. In order for the model to succeed and for beneficiaries to take advantage of the savings offered, it must be made clear how to determine which plans offer Select Insulins (or financial equivalents). Currently the risk of confusion and dissatisfaction is substantial, and a failure to select the right plan can lead to increased costs and worse health outcomes.

The CY 2022 Part D Senior Savings Model Communications and Market Guidance for Part D Sponsors, published on August 10, 2021 stated (p.3): "CMS will follow up with additional information pertaining to the PDSS Model and how the model is identified within the Medicare Plan Finder."

We strongly urge CMS to reinstate the Insulin Savings filter under the Special Needs category - or a similarly easy process communicated to us now - before the opening of the 2022 annual enrollment on Oct 15, 2021, notifying Plan Sponsors and participating Pharmaceutical Manufacturers of its reinstatement.

Thank you for your consideration. For questions and clarifications, please contact Christel Marchand Aprigliano of Beyond Type 1 at caprigliano@beyondtype1.org.

Sincerely,

American Diabetes Association
Association of Diabetes Care & Education Specialists
Beyond Type 1
Children with Diabetes
College Diabetes Network
Diabetes Leadership Council
Diabetes Patient Advocacy Coalition
Diabetes Sisters
The diaTribe Foundation
JDRF
National Minority Quality Forum
Taking Control of Your Diabetes

Cc: Elizabeth Fowler, Deputy Administrator, CMMI