



December 22, 2020

The Honorable Mitch McConnell
Majority Leader
U.S. Senate
Washington, D.C. 20510

The Honorable Charles Schumer
Minority Leader
U.S. Senate
Washington, D.C. 20510

The Honorable Nancy Pelosi
Speaker of the House of Representatives
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Kevin McCarthy
Minority Leader
U.S. House of Representatives
Washington, D.C. 20515

Dear Leader McConnell, Leader Schumer, Speaker Pelosi and Leader McCarthy:

The Part B Access for Seniors and Physicians (ASP) Coalition is stunned that the Centers for Medicare & Medicaid Innovation Services (CMMI) at the Centers for Medicare & Medicaid Services (CMS) announced it will move forward with a model that will lead to irreparable harm for the most vulnerable Medicare beneficiaries – the Most Favored Nation (MFN) Model for Medicare Part B drugs. On November 20, 2020, CMS released an interim final rule creating the seven-year MFN Model on a nationwide, mandatory basis, set to begin on January 1, 2021.

As a result of the MFN Model, Medicare patients with deadly and debilitating conditions – such as cancer, rheumatoid arthritis, Crohn’s disease, macular degeneration, autoimmune disorders, and rare diseases – will face massive hurdles in accessing critical therapies. CMS acknowledged repeatedly that the model would force beneficiaries to “forego” care; in fact, the CMS Office of the Actuary predicts 19 percent lower utilization of these drugs due to “no access.”

The ASP Coalition is an alliance of patient and provider groups dedicated to preserving patient access to the lifesaving therapies covered by Medicare Part B. We call on Congress to act immediately to delay implementation of this risky, ill-conceived, and misdirected model. Swift action is essential to protect the most vulnerable Medicare beneficiaries across the U.S.

We are incredibly discouraged that CMS, in its own materials, acknowledges that patients will suffer potentially devastating impacts during the most critical medical challenges of their lives:

- CMS states that a portion of the model “savings is attributable to beneficiaries not accessing their drugs through the Medicare benefit, along with the associated lost utilization.”
- CMS adds that beneficiaries may “experience access to care impacts” by being forced to use an “alternative therapy that may have lower efficacy or greater risks, or postponing or forgoing treatment.”
- The CMS Office of the Actuary estimates \$85 billion in savings, partly as a result of patients foregoing treatments.



As a result of this ill-founded model, seniors will be forced to accept less effective treatments, or will lose access entirely – causing deadly or costly complications that could have been prevented.

Further, this dramatic new policy will force providers to decide between accepting reimbursement rates lower than the price they pay for drugs and choosing less-optimal treatments for their patients. This model will impact nearly all Part B providers and will have a disproportionate impact on patients of small and rural health care providers. Adding to the burdens of already struggling rural communities is the wrong policy for Medicare patients living in these areas.

We urge you to pass legislation to require an immediate delay of the MFN Model and look forward to working with you on patient-centered proposals to improve Medicare quality and value.

Sincerely,
(355 signers listed below)

1in9: The Long Island Breast Cancer Action Coalition (Hewlett House)

ACT - Advancing CT Together

Action CF

Action Wellness

ADAP Advocacy Association (aaa+)

ADNP Kids Research Foundation

Advocates for Responsible Care (ARxC)

AIDS Delaware, Inc.

Aimed Alliance

Alabama Cancer Congress

Alabama Society for the Rheumatic Diseases

Alaska Rheumatology Alliance

AliveAndKickn

Allergy & Asthma Network

Alliance for Patient Access (AfPA)

ALS Association Northern New England Chapter

American Academy of Allergy, Asthma & Immunology (AAAAI)

American Academy of Neurology

American Academy of Ophthalmology

American Autoimmune Related Diseases Association (AARDA)

American Behcet's Disease Association (ABDA)

American Bone Health

American College of Rheumatology

American Gastroenterological Association



American Glaucoma Society
American Kidney Fund
American Liver Foundation
American Medical Women's Association
American Partnership for Eosinophilic Disorders
American Society for Bone and Mineral Research
American Society of Cataract and Refractive Surgery
American Society of Hematology
American Society of Retina Specialists
American Urological Association
Angelman Syndrome Foundation
Applied Pharmacy Solutions
Arizona Aunt Rita's Foundation
Arizona Bioindustry Association, Inc. (AZBio)
Arizona Myeloma Network (AzMN)
Arizona Ophthalmological Society
Arkansas Rheumatology Association
Arthritis Foundation
Association for Clinical Oncology
Association of Community Cancer Centers (ACCC)
Association of Northern California Oncologists (ANCO)
Association of Women in Rheumatology (AWIR)
Asthma and Allergy Foundation of America
Beacon Charitable Pharmacy
BIO Alabama
BIO El Paso-Juarez
Bio Nebraska Life Sciences Association
Bio North Texas
Biocom California
BioCT
BioFlorida
BioForward Wisconsin
BioKansas
BioME
BioNJ
BioOhio
Bioscience Association of North Dakota
Bioscience Association of West Virginia



Biotechnology Innovation Organization
BioUtah
Black Women's Health Imperative
Brain Injury Alliance of Arizona
Breaking The Sickle Cell Cycle Foundation, Inc.
Brenda's Brown Bosom Buddies, Inc.
California Academy of Eye Physicians and Surgeons
California Access Coalition
California Chronic Care Coalition
California Hepatitis C Task Force
California Hispanic Chambers of Commerce
California Life Sciences Association (CLSA)
California Medical Association
California Rheumatology Alliance (CRA)
Cancer Awareness Network for Children Inc.
Cancer Caregivers AZ
Cancer Lifeline
Cancer Pathways
Cancer Support Community Arizona
Caregiver Action Network
Caregiver Voices United
Caring Ambassadors Program
Carrie's TOUCH Breast Cancer Organization
Casey Eye Institute - Oregon Health and Science University
Centro de Mi Salud, LLC
Charleston Parkinson's Support Group
Christian Council of Delmarva
Chronic Care Collaborative
Chronic Care Policy Alliance
Chronic Disease Coalition
Chronic Disease Prevention Council
CLL Society
Coalition of Hematology Oncology Practices (CHOP)
Coalition of State Rheumatology Organizations (CSRO)
Coalition of Texans with Disabilities (CTD)
Coalition of Wisconsin Aging and Health Groups
Color of Crohn's & Chronic Illness
Colorado BioScience Association



Colorado Gerontological Society
Colorado Rheumatology Association
Colorado State Grange
Combined Health Agencies Drive (CHAD) of Nebraska
Community Access National Network (CANN)
Community Health Action Network
Community Liver Alliance
Community Oncology Alliance (COA)
Connecticut Bioscience Growth Council
Connecticut State Medical Society (CSMS)
Council for Affordable Health Coverage
Council of State Bioscience Associations
Cutaneous Lymphoma Foundation
Cystic Fibrosis Research, Inc. (CFRI)
Delaware BioScience Association, Inc.
Delaware Society of Clinical Oncology
Denali Oncology Group
Digestive Health Physicians Association (DHPA)
Easterseals
Economic Development Corporation of New Haven
Empire State Hematology and Oncology Society
Fabry Support and Information Group
Familia Unida Living with MS
Florida Society of Clinical Oncology (FLASCO)
Florida Society of Rheumatology
Free ME from Lung Cancer
GBS|CIDP Foundation International
Georgia Bio
Georgia Society of Rheumatology
Gilda's Club South Florida
Global Colon Cancer Association
Global Healthy Living Foundation
Global Liver Institute
GO2 Foundation for Lung Cancer
Hawaii Society of Clinical Oncology
Health Education Advocacy Learning (HEAL) Collaborative
Healthcare Institute of New Jersey (HINJ)
Healthcare Leadership Council



HealthHIV
HealthyWomen
Hepatitis C Mentor and Support Group (HCMSG)
ICAN - International Cancer Advocacy Network
Idaho Medical Association
Idaho Society of Clinical Oncology
Illinois Biotechnology Innovation Organization (iBIO)
Illinois Medical Oncology Society
Illinois Society for the Prevention of Blindness
Illinois Society of Eye Physicians & Surgeons (ISEPS)
Indiana Academy of Ophthalmology (IAO)
Indiana Health Industry Forum (IHIF)
Indiana Oncology Society
INDUNIV Research Center, Inc.
Infusion Access Foundation
Infusion Providers Alliance
International Association of Hepatitis Task Forces (IAHTF)
International Foundation for Autoimmune & Autoinflammatory Arthritis (AiArthritis)
International Myeloma Foundation
International Pemphigus and Pemphigoid Foundation
Intrafusion
ION Solutions
Iowa Biotechnology Association
Iowa Oncology Society
Iowa State Grange
Jewish Family Services of Delaware
Kansas Society of Clinical Oncology
Kansas Society of Eye Physicians & Surgeons (KSEPS)
KCCure
Kentuckiana Rheumatology Alliance
Kentucky Access to Care Coalition
Kentucky Life Sciences Council
KidneyCAN (Cancer Action Network)
Large Urology Group Practice Association (LUGPA)
Las Vegas HEALS
Latino Diabetes Association
Life Science Tennessee
Life Science Washington



Life Sciences Pennsylvania
Liver Coalition of San Diego
Louisiana BIO
Louisiana Oncology Society
Lung Cancer Research Foundation
Lupus and Allied Diseases Association, Inc.
Lupus Foundation New England
Lupus Foundation of America
Lupus Foundation of Arkansas, Inc.
Lupus Foundation of Colorado
Lupus Foundation of Southern Arizona
Lupus of Nevada
Maryland DC Society of Clinical Oncology
Maryland Society for the Rheumatic Diseases (MSRD)
Maryland State Grange
Maryland Technology Council
Massachusetts Biotechnology Council (MassBio)
Massachusetts, Maine & New Hampshire Rheumatology Association
Meals on Wheels of Wake County
Medical Association of Georgia
Medical Center of the Americas Foundation
Medical Oncology Association of Southern California, Inc. (MOASC)
Medical Society of the State of New York
Medical Society of Virginia
Men's Health Network
Michigan Biosciences Industry Association (MichBio)
Michigan Lupus Foundation
Michigan Osteopathic Association
Michigan Society of Eye Physicians and Surgeons (MiSEPS)
Michigan Society of Hematology and Oncology (MSHO)
MidWest Rheumatology Association
Minnesota Independent Physicians Association
Minnesota Society of Clinical Oncology
Mississippi Arthritis and Rheumatism Society (MSARS)
Mississippi Oncology Society
Mississippi Psychiatric Association
Mississippi State Medical Association
Missouri Biotechnology Association (MOBIO)



Missouri Oncology Society
MLD Foundation
Montana Bioscience Association
Montana State Oncology Society
Multiple Sclerosis Foundation
My Style Matters
My Three Sicklers (MTS) Sickle Cell Foundation
National Alliance of State Prostate Cancer Coalitions
National Association of Hispanic Nurses Houston
National Association of Nutrition and Aging Services Programs
National Coalition for LGBT Health
National Community Oncology Dispensing Association (NCODA)
National Comprehensive Cancer Network
National Consumers League
National Eczema Association
National Grange
National Hispanic Council on Aging
National Hispanic Medical Association
National Indian Council on Aging
National Infusion Center Association (NICA)
National Medical Association (NMA)
National Minority Quality Forum
National Oncology State Network (NOSN)
National Organization of Rheumatology Managers (NORM)
National Psoriasis Foundation (NPF)
National Puerto Rican Chamber of Commerce
Nebraska Academy of Eye Physicians and Surgeons
Nebraska Oncology Society
Nebraska Rheumatology Society
Nevada Chronic Care Collaborative
Nevada Oncology Society
New Jersey Association of Mental Health and Addiction Agencies, Inc. (NJAMHAA)
New Jersey Mayors Committee on Life Sciences
New Jersey Rheumatology Association (NJRA)
New Mexico Biotechnology & Biomedical Association (NMBio)
New Mexico Business Coalition (NMBC)
New Mexico Society of Clinical Oncology - NMSCO
New York State Rheumatology Society



NewYorkBIO
North Carolina Biosciences Organization (NCBIO)
North Carolina Medical Society
North Carolina Oncology Association
North Carolina Rheumatology Association (NCRA)
North Carolina Society of Eye Physicians and Surgeons (NCSEPS)
North Carolina State Grange
Northeast Ohio Black Health Coalition
Northern New England Clinical Oncology Society
Ohio Association of Rheumatology
Ohio Federation for Health Equity and Social Justice
Ohio Hematology Oncology Society
Oklahoma Society of Clinical Oncology
Oncology Managers of Florida
Oregon Bioscience Association
Oregon Rheumatology Alliance
Oregon Society of Medical Oncology (OSMO)
Patients Rising Now
Pennsylvania Academy of Ophthalmology
Pennsylvania Prostate Cancer Coalition
Pennsylvania Rheumatology Society
Pennsylvania Society of Oncology & Hematology
Philadelphia Rheumatism Society
Physicians Advocacy Institute
Platelet Disorder Support Association
Premier Oncology Hematology Management Society (POHMS)
Prevent Blindness
Prevent Blindness Georgia
Prevent Blindness Iowa
Prevent Blindness North Carolina
Prevent Blindness Wisconsin
Prevent Blindness, Ohio Affiliate
Prostate Health Education Network, Inc.
Psychosocial Rehabilitation Association of New Mexico
Puerto Rico Hematology and Medical Oncology Association
Pulmonary Hypertension Association
Rare Access Action Project
Regarding Cancer



RetireSafe
Rheumatism Society of the District of Columbia
Rheumatology Alliance of Louisiana (RAL)
Rheumatology Association of Minnesota and the Dakotas
Rheumatology Association of Nevada
Rheumatology Nurses Society
RI Bio
Richmond Academy of Medicine
Rio Grande Valley Partnership
Rocky Mountain Oncology Society
Rocky Mountain Stroke Center
Rush To Live
Rutgers-RWJ Medical School
Rx in Reach GA Coalition
Rx Partnership
SCBIO
Sick Cells - A Sickle Cell Disease Organization
Society for Gynecologic Oncology
Society of Utah Medical Oncologists
South Carolina Medical Association
South Carolina Oncology Society
South Carolina Rheumatism Society
South Dakota Biotech Association
South Florida Cancer Association
Stanford University School of Medicine
State Grange of Minnesota
State of Texas Association of Rheumatologists (STAR)
State of West Virginia Rheumatology Society
Survivors Cancer Action Network
Tennessee Oncology Practice Society (TOPS)
Tennessee Rheumatology Society
Texas Healthcare and Bioscience Institute (THBI)
Texas Kidney Foundation
Texas Medical Association
Texas Ophthalmological Association
Texas Society of Clinical Oncology
The Arizona Clinical Oncology Society
The Headache and Migraine Policy Forum



The Kim Foundation
The Latino Coalition
The Macula Society
The Purple Iris Foundation
The US Oncology Network
Tigerlily Foundation
TOUCH, The Black Breast Cancer Alliance
U.S. Hereditary Angioedema Association
U.S. Pain Foundation
Upstage Lung Cancer
Vasculitis Foundation
Vets Place Northwest - Welcome Home
Virginia Association of Hematologists & Oncologists
Virginia Biotechnology Association
Virginia Chamber of Commerce
Virginia Society of Eye Physicians and Surgeons
Virginia Society of Rheumatologists
Washington (State) Rheumatology Alliance
Washington State Medical Association
Washington State Medical Oncology Society
West Virginia Oncology Society
Wisconsin Association of Hematology & Oncology
Wisconsin Rheumatology Association
Wyoming Epilepsy Association
Wyoming State Advocates in Leadership
Wyoming State Oncology Society
ZERO - The End of Prostate Cancer

cc: Honorable Alex Azar, Secretary, Department of Health and Human Services
Honorable Seema Verma, Administrator, Centers for Medicare and Medicaid Services
Honorable Chuck Grassley, Chairman, Senate Finance Committee
Honorable Ron Wyden, Ranking Member, Senate Finance Committee
Honorable Richard Neal, Chairman, Committee on Ways and Means
Honorable Kevin Brady, Ranking Member, Committee on Ways and Means
Honorable Frank Pallone, Jr., Chairman, Committee on Energy and Commerce
Honorable Greg Walden, Ranking Member, Committee on Energy and Commerce