Action Plan Implementation Activity

Value of Pharmacists’ Patient Care Services

- **AMCP Sends Letter to HHS OIG on Anti-Kickback Statute**
  
  As part of ongoing efforts to remove barriers to the adoption of value-based contracting, AMCP sent a letter to the Department of Health and Human Services Office of the Inspector General (HHS OIG) advocating for the inclusion of pharmaceutical manufacturers and PBMs in the newly created safe harbors for value-based arrangements. The HHS OIG issued a final rule in November 2020 that created this new safe harbor protection for value-based arrangements, particularly those in which participants take on significant or full financial risk, but the final rule specifically excluded drug manufacturers and PBMs from the new protections, making them of limited utility for value-based arrangements for prescription drugs.

- **Workgroup on Addressing Barriers to Value-based Payment Models in Integrated Delivery Networks**

  AMCP has convened a workgroup to identify processes, systems, and methodologies that are critical for value-based agreements. The workgroup includes experts working to establish long- and short-term strategic imperatives and approaches. AMCP held the first workgroup meeting on March 9.
• **New AMCP Foundation Web Tools for Providers and Patients Highlight Pharmacist Patient Care Services**

AMCP Foundation’s latest web tools for caregivers and care teams are focused on age-related macular degeneration. Hosted at amd.care, the tools highlight pharmacists’ patient care process in the “Navigating Insurance” section of the portal for health care providers. This is the fifth application in a series of practical, research-informed tools to communicate and collaborate more effectively.

**Health Information Technology**

No updates for this time period.

**Provider Status Recognition**

No updates for this time period.

**Organizational Update (other information):**

- **Ongoing Diversity, Equity, and Inclusion Activities**

  In June 2020, AMCP united with 13 national pharmacy organizations to take a public stand against racial injustice. AMCP asked members how the pharmacy profession could demonstrate a commitment to eliminate racism and inequality.

  Since then, AMCP has been working to weave measurable social justice goals into all AMCP and AMCP Foundation strategic plans and initiatives. The Boards are committed to this priority and are working to identify AMCP’s piece of this much larger puzzle. For example, AMCP is working to build an equity, diversity, and inclusion statement that will help guide all our planning. Addressing health disparities is one of three strategic priorities recently announced by AMCP (see below).

  At AMCP 2021, the 2020 *JMCP* Award for Excellence was announced. The awardee was “Racial/ethnic and gender disparities in the use of erythropoiesis-stimulating agents and blood transfusions: cancer management under Medicare's reimbursement policy” by Minghui Li, PhD; Richard Schulz, PhD; Marie Chisholm-Burns, PharmD; Junling Wang, PhD; and Z. Kevin Lu, PhD. In July, *JMCP* published, “Evaluating perceptions of social determinants of health and Part D star performance of Medicare Advantage-contracted primary care providers serving a South Texas market.” This article continues a series of articles in response to the journal’s call for papers on this topic.

- **AMCP Hosts Partnership Forum on Racial Health Disparities**

  On March 23-24, AMCP convened a virtual multidisciplinary stakeholder forum exploring racial health disparities. The forum, “Racial Health Disparities: A Closer Look at Benefit Design,” engaged more than 40 experts including payers, integrated delivery system leaders, HEOR analysts, academicians, providers, pharmaceutical manufacturers, PBMs, patient advocates, and other health care stakeholders. Forum participants joined
together to further elucidate potential structural issues within the current formulary and benefit design processes that lead to racial health disparities or inequities and propose viable solutions to reduce these disparities. AMCP released an Executive Summary in early April, and plans to publish proceedings and hold a webinar in late summer/fall.

- **AMCP New Strategic Priorities Announced**

  This past year showed the stark reality of cracks, inequalities, and barriers in our health care system. AMCP, along with the rest of the world, witnessed the grim results of the COVID-19 pandemic. Armed with these insights, AMCP used them to guide the creation of its new strategic priorities.

  - Optimize value and access.
  - Address health disparities.
  - Smart membership growth.

- **AMCP Releases 2021 Government Relations Priority Issues**

  On March 4, AMCP Policy and Government Relations staff shared AMCP’s 2021 Government Relations Priority Issues. AMCP’s 2021 priorities are built on three pillars: 1) Rising cost of pharmaceuticals and price transparency, 2) Shift from fee-for-service to value-based care, and 3) Managed care pharmacy strategies. AMCP will align its strategy with AMCP’s Stand Against Racial Injustice.

- **AMCP Joins Supply Chain Stakeholders in Statement on Executive Order; Medicare Advantage Beneficiary Access to COVID-19 Vaccines**

  On April 19, AMCP joined the Pharmaceutical Supply and Payment Chain (PSPC) Coalition in two communications to the Biden administration. The PSPC Coalition thanked the Biden administration for the Executive Order on American Supply Chains and affirmed PSPC Coalition members’ commitment to ensuring patients have access to the medicines they need. The PSPC Coalition urged the administration to focus on solutions that harness existing relationships with international trade partners and cautioned that measures that would change existing sourcing and production could disrupt patient access to medicines. The PSPC Coalition also sent joint recommendations to CMS regarding Medicare Advantage enrollees seeking access to COVID-19 vaccines without their Original Medicare cards. The PSPC Coalition urged CMS to provide clear guidance to all administration sites and providers and instruct MACs to provide any assistance necessary to providers to ensure vaccine administration is properly reimbursed and entered into the COVAX portal.

- **AMCP Submits Comments on MCIT Rule**

  AMCP submitted a letter on the reopened comment period for the Medicaid Coverage of Innovative Technologies rule, which created a pathway for fast national Medicare coverage of innovative technologies that could include digital therapeutics if additional barriers are addressed. AMCP urged CMS to provide additional clarity on the coverage of digital therapeutics in the Medicare program.

- **AMCP Hosts Pre-Approval Information Exchange Congressional Briefings**
On Feb. 25, Policy and Government Relations staff hosted four identical briefings for Congressional staff on pre-approval information exchange (PIE). AMCP Board Members Christina Barrington and Jim Kenney joined AMCP staff to share an overview of AMCP and provide education on what PIE is and how it benefits patients.

- **AMCP Responds to OPM RFI**

  AMCP responded to a request for information from the Office of Personnel Management (OPM) regarding the pharmacy benefit landscape and specific strategies to enhance the Federal Employees Health Benefits (FEHB) Program. OPM administers the FEHB Program, which provides health care coverage to approximately 8.2 million federal employees, retirees, their dependents, and other eligible enrollees, as well as contracts for more than 200 insurance plans. OPM was seeking feedback from a variety of stakeholders on ways to optimize the drug benefits offered to FEHB enrollees, with specific questions related to the use of pharmacy networks, medication management programs, utilization management programs, and other tools used to drive performance, value, and outcomes.

- **2021 Priorities within Managed Care Pharmacy Research Agenda Finalized**

  This year, AMCP and AMCP Foundation are focused on creating and elevating evidence around expedited approvals and health disparities. The new research questions are derived from the broad, four-part research agenda that identifies critical knowledge gaps within managed care pharmacy. Our efforts around expedited approvals and health disparities reside within the research pillar agenda about utilizing real-world evidence (RWE) to inform managed care pharmacy decision-making.

  Research aims in these two priority areas are:

  - **Expedited Approvals**: Generating RWE for drugs approved in an expedited manner by FDA as they typically have very limited clinical or economic evidence at the time of launch; and
  - **Health Disparities**: Addressing disparities in designing and delivering health care through managed care pharmacy, while considering diversity, equity, and inclusion (DEI) as well as social determinants of health (SDoH).

  In addition, AMCP and AMCP Foundation established a new research priority: assessing managed care pharmacy programs focused on patient care in response to the COVID-19 pandemic. The research agenda now includes four pillars and eight priorities.