



July 1, 2014

Ms. Marilyn Tavenner
Administrator
Centers for Medicare & Medicaid Services
Department of Health & Human Services
200 Independence Avenue, SW
Washington, D.C. 20201

Dear Administrator Tavenner:

On behalf of The Forum of State Associations (FSA), an affiliate organization to the National Association for Home Care and Hospice (NAHC), comprised of state-based home care and hospice associations from across the nation, we write to express concerns related to the negative beneficiary consequences that are resulting from the Centers for Medicare & Medicaid Services' (CMS) imposition of a beneficiary-level prior authorization (PA) requirement for all drugs processed by Part D plans for patients who are enrolled in the Medicare hospice program.

The FSA supports CMS' goal of ensuring that prescription medications for beneficiaries enrolled in hospice are financed by the appropriate part of the Medicare program. However, hospice providers report that the new PA process is creating significant delays in the dispensing of vitally important medications, is increasing out-of-pocket costs for hospice beneficiaries and is creating massive confusion for Medicare hospice beneficiaries and their families. Further, efforts by hospice providers to address questions of coverage responsibility at the front end or to communicate patient status information directly to plans (as advised by CMS' guidance and FAQs on this issue) are in large part being rebuffed.

We support the efforts by 45 national organizations (as represented in their letters to you of June 11 and June 23) urging that CMS halt its existing requirement that Part D plans impose a beneficiary-level PA process until such time as a workable alternative that ensures timely and appropriate access to medications for hospice patients can be developed. We stand ready to assist in any way that we can.

Sincerely,

The Forum of State Associations
(comprised of the following individual State Associations)



Alabama Association of Home Health Agencies
Alaska Home Care and Hospice Association
Arizona Association for Home Care
Association for Home and Hospice Care of North Carolina
California Association for Health Services at Home
Connecticut Association for Healthcare at Home
Florida Hospice & and Palliative Care Association
Georgia Association for Home Health Agencies
Healthcare Association of Hawaii
Home Care & Hospice Alliance of Maine
Home Care Aide Council
Home Care Alliance of Massachusetts
Home Care Association of Arkansas
Home Care Association of Colorado
Home Care Association of Florida
Home Care Association of New Hampshire
Home Care Association of New Jersey
Home Care Association of New York State
Home Care Association of Washington
Home Care Council of New Jersey
HomeCare Association of Louisiana
Hospice and Palliative Care Association of Michigan
Idaho Association for Home Care
Illinois Home Care and Hospice Council
Indiana Association for Home & Hospice Care
Iowa Alliance in Home Care
Iowa Health Care Association
Kansas Home Care Association
Kentucky Home Care Association
Maryland-National Capital Home Care Association
MHA ... An Association of Montana Health Care Providers
Michigan Association for Home Care
Midwest Care Alliance
Minnesota HomeCare Association
Mississippi Association for Home Care
Missouri Alliance for Home Care
Nebraska Association of Home & Community Health Agencies
Nevada Home Care Association
New Jersey Hospital Association
New Mexico Association for Home and Hospice Care
New York State Association of Health Care Providers
Ohio Council for Home Care and Hospice
Oklahoma Association for Home Care
Oregon Association for Home Care
Pennsylvania Homecare Association



Rhode Island Partnership for Home Care
South Carolina Home Care and Hospice Association
South Dakota Association of Healthcare Organizations
Tennessee Association for Home Care
Tennessee Hospital Association Home Care Alliance
Texas Association for Home Care and Hospice
The Carolinas Center for Hospice and End of Life Care
Utah Association for Home Care
Vermont Assembly of Home Health Agencies
Virginia Association for Home Care and Hospice
West Virginia Council of Home Health Agencies
Wisconsin Association for Home Healthcare