

June 29, 2015

Kevin Counihan
Director and Marketplace CEO
Center for Consumer Information and Insurance Oversight
200 Independence Avenue SW
Washington, DC 20201

Re: Drug-Specific Costs in the Proposed Out-Of-Pocket (OOP) Cost Comparison Tool for the Federally-facilitated Marketplaces (FFMs)

Dear Director Counihan:

We, the undersigned 103 patient, provider, and consumer organizations listed below, are writing this letter to strongly encourage the Centers for Medicare and Medicaid (CMS) to include accurate drug-specific out-of-pocket (OOP) costs in the proposed OOP cost estimator under development for the federally facilitated marketplace for the 2016 enrollment period. The success of the marketplaces will only be fully realized if people with chronic diseases and disabilities and their family caregivers have access to tools that enable them to make properly informed purchasing decisions.

We are pleased that CMS is moving forward to build and launch a tool so shoppers can compare expected OOP costs in exchange plans. This is an enormous step forward to helping people select the right plan for them.

To better assist exchange plan shoppers who rely on medications to treat their health needs, this calculator must: 1) reflect real formularies with coverage and tier placement information, 2) allow patients to enter their medicines, and 3) use approximate negotiated prices of these drugs. The Medicare Plan Finder has long included this capability and accuracy of formulary information, and demonstrates the agency's ability to deliver patient-centered tools that can help beneficiaries make appropriate health plan choices.

The out-of-pocket expenses that people experience in exchange plans can be a determining factor in whether they are able to access necessary care. And, since so many patients rely on medications to manage their conditions, accurate information about expected out-of-pocket costs for drugs is a key factor for making a good plan enrollment decision. Without specific support tools to help them pick a plan that meets both their health and budget needs, enrollees will continue to be forced to select plans based primarily on premium costs.

We understand the complexity of building a tool that meets the varied needs of the heterogeneous patient population. Should CMS not be able to build a robust calculator for the 2016 enrollment period, we believe it is imperative for you to incorporate accurate drug information into the 2017 calculator. In the meantime, we would urge you to link to other OOP calculators utilizing drug costs, such as www.PuttingPatientsFirst.net.

For patients to adequately compare costs for available exchange plans, they need access to a tool that assists in the calculation of all expected out-of-pocket costs, including medications, across an entire plan year.

Sincerely,

National Organizations:

ActionAIDS	The EveryLife Foundation for Rare Diseases
ADAP Advocacy Association (aaa+)	Fight Colorectal Cancer
AIDS Legal Referral Panel	The Foundation for Ichthyosis & Related
Allergy & Asthma Network	Skin Types, Inc.
Alpha-1 Foundation	GBS/CIDP Foundation International
The ALS Association	Global Genes
American Academy of Addiction Psychiatry	HealthHIV
American Association for Respiratory Care (AARC)	Huntington's Disease Society of America
American Association on Health and Disability	Hydrocephalus Association
American Autoimmune Related Diseases Association	Immune Deficiency Foundation
American Behcet's Disease Association (ABDA)	International Essential Tremor Foundation (IETF)
American Foundation for Suicide Prevention	International Myeloma Foundation
American Heart Association	Kanter Health
American Kidney Fund	Lakeshore Foundation
American Lung Association	The LAM Foundation
American Medical Association	Leukemia & Lymphoma Society
American Neurological Association	LIVESTRONG Foundation
American Sexual Health Association	Lupus and Allied Diseases Association, Inc.
Amputee Coalition	Lupus Foundation of America
Arthritis Foundation	The Marfan Foundation
Asthma and Allergy Foundation of America	M-CM Network
CancerCare	MdDS Balance Disorder Foundation
Caregiver Action Network	Mental Health America
Chris4lofe Colon Cancer Foundation	The Myositis Association
Clear Choices Campaign	National Association of States United for
Colon Cancer Alliance	Aging and Disabilities
Community Access National Network (CANN)	National Alliance for Hispanic Health
COPD Foundation	National Alliance on Mental Illness
COPD-ALERT	National Alopecia Areata Foundation
Dementia Society of America	National Association for Hearing and
Easter Seals	Speech Action
EFFORTS	National Consumers League
Epilepsy Foundation	National Council for Behavioral Health
	National Council on Aging
	National Eczema Association
	National Hemophilia Foundation
	National Kidney Foundation

National Medical Association
National Minority Quality Forum
National Multiple Sclerosis Society
National Partnership for Women & Families
National Patient Advocate Foundation
National Psoriasis Foundation
National Women's Law Center
NTM Info & Research
Ovarian Cancer National Alliance
OWL – The Voice of Women 40+
Parent Project Muscular Dystrophy
Parkinson's Action Network
Prevent Blindness
Prevent Cancer Foundation
Pulmonary Hypertension Association
The Pulmonary Paper
RASopathies Network USA

RetireSafe
Rett Syndrome Research Trust
Rush To Live
Salud USA
Scleroderma Foundation
Sjögren's Syndrome Foundation
Society for Women's Health Research
Spina Bifida Association
The Sturge-Weber Foundation
Susan G. Komen
US COPD Coalition
US Pain Foundation
Veterans Health Council
Vietnam Veterans of America

State and Local Organizations:

Breathe New Hampshire
Colorado Lung Health Connection
Hawaii COPD Coalition
MaineHealth
North Carolina COPD Taskforce