Good afternoon. My name is John Clymer. I am executive director of the National Forum for Heart Disease & Stroke Prevention, a non-profit, non-partisan organization dedicated to health equity and optimizing cardiovascular health and well-being throughout the lifespan. Through our Value & Access Collaboration, patient, provider, payer, purchaser, public health, and pharma organizations collaborate to enhance health and well-being by supporting people’s access to evidence-based care that is appropriate for them.

The National Forum appreciates the opportunity to provide feedback on the Medicare Drug Price Negotiation Program, as it will have rippling effects on population health in the short and long term.

- We urge CMS to make sure its drug price negotiation program ensures beneficiary access to appropriate evidence-based care, that is, the right treatment for the right patient at the right time. Given that stroke reduces mobility in more than half of survivors aged 65-plus, it is essential that this policy improves and not reduce access to apixaban.

- It is imperative that this program not exacerbate access challenges for disadvantaged populations. For example, non-Hispanic Blacks have far higher rates of first stroke and death from stroke, an event that apixaban helps prevent. We recommend CMS work with the Office of Minority Health to achieve this requisite.

- We urge CMS to guard against potential unintended consequences, such as utilization management that could result in reduced access to appropriate treatment. Price ceilings intended to benefit consumers could have the unintended consequence of reducing access if pharmacy benefit managers drop medications from formularies or move them to higher out-of-pocket cost tiers because higher-priced drugs offer PBMs bigger rebates. Anticoagulant therapies are not interchangeable; multiple studies have found different event rates for people on different anticoagulants.

- We support the implementation of evidence-based care that aligns incentives for patients, providers, pharma innovators, and purchasers.

In summary, the National Forum for Heart Disease & Stroke Prevention, on behalf of its more than 100 nonprofit, for-profit, and public sector member organizations, urges CMS to ensure the Medicare Drug Price Negotiation Program:
supports evidence-based strategies for appropriate care, and protects beneficiary access;

guards against potential unintended consequences, such as utilization management that could result in reduced access to appropriate treatment; and

aligns incentives for all stakeholders.