



February 3, 2006

The Honorable Mark McClellan
Administrator
Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Hubert H. Humphrey Building
Washington, DC 20201

Dear Dr. McClellan:

Over the past year and a half, MAPRx has appreciated the opportunity to work with you and your staff to fine-tune Part D implementation to meet the needs and resources of beneficiaries with chronic diseases and disabilities. The success of this undertaking depends on your leadership and the expertise of your staff, and we appreciate the forthrightness of our discussions and the dedication of your staff in our collaborations. It is in this spirit that we have identified a concern that we now bring to your attention. We also offer a suggested solution for CMS consideration. We would like to meet with you as quickly as possible to further discuss this concern and its resolution.

MAPRx members understand the need for CMS messages and outreach materials that encourage beneficiaries to enroll in Medicare Part D and that these messages and materials have been crafted to reduce barriers to participation. The result, however, has been a “one-size-fits all” message focusing exclusively on “how easy, simple, and fast” it is to enroll. Unfortunately, this message can be misleading for beneficiaries with chronic conditions and/or disabilities, for whom a prescription program—and the decision about which plan to choose—is complex. In reality, the Medicare Part D enrollment process requires significant time, preparation, forethought, and calculations for a majority of people with serious chronic diseases and/or disabilities, who often have multiple illnesses and take numerous medications. In many instances, they need to consult with a health professional, family member, and/or other counselor or assistant in order to understand, navigate, and complete the enrollment process. Thus, an unintended consequence of the current messaging is that many of these beneficiaries, their caregivers, and even their state-based counselors are encountering unexpected frustrations in the enrollment process, resulting in impatience and delayed enrollment—or a decision not to enroll.

MAPRx urges CMS to expand its communication strategy to include in its current messaging strategy additional language to acknowledge this enrollment reality for people with special health care needs in a positive, encouraging way. We have drafted text for CMS consideration and, and we request a meeting with you or Kathleen Harrington to adjust the statement and seek agreement about its incorporation in CMS messaging as necessary and appropriate.

Suggested added text for CMS Part D enrollment outreach messaging:

If you have multiple health problems, it is very important that you carefully review the details of each plan available so you can enroll in the one that best serves your specialized prescription needs. If necessary, seek assistance to fully understand your options.

MAPRx will assist CMS in any way necessary to address this need in message design and delivery. It is in our shared interests to ensure that all qualifying beneficiaries receive the benefits available to them under Medicare Part D and that the enrollment process be safe, seamless, and effective for each person. As part of our commitment to this goal, on February 7th, MAPRx will launch RxCompare™—a step-by-step tool to help beneficiaries choose the Medicare Rx coverage that meets their needs. RxCompare™ helps beneficiaries determine if they need to enroll in a Medicare drug plan and, if they do, to systematically compare the drug plans where they live and select the best option for their prescription needs. RxCompare™ works in tandem with Medicare’s on-line “Prescription Drug Plan Finder”, with customer service representatives at 1-800-MEDICARE, and with information provided by individual plans. Tom Dudley, David Chatel, and other CMS staff have provided feedback to MAPRx in the development of the RxCompare™ tool. RxCompare™ can be downloaded at the MAPRx website (www.maprx.info).

As always, please know that we are grateful for your attention to our concerns and for your steadfast commitment to ensuring that all beneficiaries—particularly those most vulnerable—have access to the prescription drugs they need and deserve. We look forward to working with you or your staff on this issue; please contact Mary Worstell, MPH, Convener for MAPRx (Worstell@lupus.org or via telephone at 202-349-1152).

Sincerely,

Alzheimer's Association
American Academy of Physician Assistants
American Autoimmune Related Diseases
Association
The Arc
Asthma and Allergy Foundation of America
Cystic Fibrosis Foundation
Easter Seals
Epilepsy Foundation of America
Lupus Foundation of America
Men’s Health Network

National Alliance on Mental Illness
National Association of Community Health
Centers
National Family Caregivers Association
National Grange
National Health Council
National Kidney Foundation
National Multiple Sclerosis Society
United Cerebral Palsy
Visiting Nurse Associations of America
WomenHeart: National Coalition for
Women with Heart Disease