



American Autoimmune

Related Diseases Association, Inc.

April 9, 2020

Dear Representative and Staff,

AARDA applauds the growing number of champions in the U.S. House of Representatives who are urging the Centers for Medicare and Medicaid Services (CMS) to improve and implement its Interim Final Rule to assure access to life-saving Medicare Part B injection and infusion medicines in home settings for people living with autoimmune diseases, serious illness, and other chronic conditions.

"Patients are extremely anxious about barriers to accessing their infusion medicines or venturing out into the community, potentially to facilities where people are gathering for COVID-19 related testing and care, when they have been expressly warned against such contact", says Randall Rutta, President and CEO of the American Autoimmune Related Diseases Association (AARDA). "Their underlying conditions put them at high risk of contagion and serious illness. For a sizable share of autoimmune patients, Medicare Part B is a lifeline to life-saving physician-administered infusion and injectable medicines. We strongly believe that coverage for all Part B drugs and their related administration costs must be made temporarily available in the home setting to allow beneficiaries access to home injection and infusion of these drugs, through appropriate providers and clinical staff with the expertise to administer these drugs safely, and do so with full PPE and training to prevent the transfer of COVID-19 infection to patients or among home care personnel."

AARDA joins U.S. Representatives Eliot Engel (NY) and Fred Upton (MI) and House Members in calling on CMS to take steps to:

- a) allow beneficiaries to receive physician-administered Part B-covered infusible and injectable medicines in the home setting during the emergency period, and when determined appropriate by the prescribing physician;
- b) provide appropriate payment for these drugs with consideration of methods used in a physician's office or hospital outpatient setting;
- c) sufficiently reimburse for administration services rendered in the home setting.

AARDA will submit comments for CMS consideration during the comment period, but cannot emphasize more strongly the need for immediate and appropriate access to Medicare Part B infusion and injection medicines to help people with autoimmune diseases stay on-track with their treatments and avoid the potentially harmful, painful and lasting consequences of gaps in access and adherence.

Randall Rutta
President & CEO
American Autoimmune Related Diseases Association