



Academy of  
Managed Care  
Pharmacy®

November 2, 2016

U.S. Pharmacopeial Convention (USP)  
Attn: Healthcare Quality Expert Committee  
12601 Twinbrook Parkway  
Rockville, MD 20852-1790

Dear Sir or Madam:

The Academy of Managed Care Pharmacy (AMCP) thanks the U.S. Pharmacopeial Convention (USP) for the opportunity to provide comments on the Draft Medicare Model Guidelines v7.0 as published on the USP website on October 1, 2016. AMCP and its members have been involved with the Medicare Model Guidelines since the inception of the process and appreciate USP's willingness to receive input from the affected health care sectors.

The Academy of Managed Care Pharmacy (AMCP) is the nation's leading professional association dedicated to increasing patient access to affordable medicines, improving health outcomes and ensuring the wise use of health care dollars. Through evidence- and value-based strategies and practices, the Academy's 8,000 pharmacists, physicians, nurses and other practitioners manage medication therapies for the 270 million Americans served by health plans, pharmacy benefit management firms, emerging care models and government.

AMCP applauds USP for the release of v7.0 of the Medicare Model Guidelines and appreciates that only minor revisions were made to the classes. Furthermore, AMCP has historically been concerned that the model guidelines were designed for use in the Medicare Part D program and as a result are not necessarily appropriate for use in the health insurance marketplaces to provide benefits to a younger population whose needs differ from the senior and disabled populations served by the Medicare program. Therefore, AMCP is pleased to see a commitment by USP to develop the USP Drug Classification System (USP DC) as an independent drug classification system for use beyond the Medicare Part D benefit. AMCP looks forward to the release of the inaugural USP DC in November 2016 and working with USP to ensure it best meets the needs of the health insurance marketplaces.

Thank you for the opportunity to provide feedback and for your consideration of our comments. AMCP looks forward to continuing work on this issue with the USP. If you have any questions regarding AMCP's comments or would like further information, please contact me at 703-683-8416 or [scantrell@amcp.org](mailto:scantrell@amcp.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'Susan A. Cantrell', is written over a horizontal line.

Susan A. Cantrell, RPh, CAE  
Chief Executive Officer

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