

June 2019

Comments to Centers for Medicare and Medicaid Services

Re: Access to HIV anti-retrovirals

In June 2019, the Centers for Medicare and Medicaid Services (“CMS”) announced [a final rule](#) maintaining the existing policy on coverage of drugs in six protected classes, including anti-retrovirals for HIV. **This was a victory for patient and provider advocates.** Notably, the final rule did not include previously-proposed measures that would have provided exceptions to Medicare’s “six protected classes,” a policy that ensures beneficiaries with complex health conditions, including HIV, have access to a full range of medication treatment options. The announcement comes after six months of opposition to the proposals from Members of Congress and patient and provider advocates, including ANAC.

ANAC members Nina Sublette and Tez Anderson were part of a small group of providers and advocates who met with HHS officials in February to describe first-hand the need for broad flexibility in access to HIV medications, especially for people aging with HIV. Aging PLWH may have a greater resistance profile due to decades of HIV therapy, have greater drug-drug interaction potentials due to polypharmacy and would likely suffer most from step therapy and resultant failed regimens.

Respectfully,



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