

# PUBLIC SUBMISSION

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## General Comment

ASP pricing for reimbursement determination is not fair to providers, especially at smaller practices, small or independent outpatient infusion centers, small hospitals. The ASP price is skewed far too low by products that aren't even available on the market due to long-standing shortages and by rebates/incentives that aren't available to smaller practices that order smaller volumes from distributors. ASP pricing needs across-the-board upward adjustment for more than just 15 biologics that outpaced inflation, and by more than 8%. Almost ALL drug prices have increased and continue to increase, but ASP on average keeps going down each quarter. An evaluation in our practice of 93 different medication prices reveals ASP is ON-AVERAGE 7% BELOW actual drug costs. Even if the +8% was across-the-board on all part B medications, that's only %1 higher than actual drug costs. No business anywhere ever can exist on only a 1% markup, and that's only dealing with actual medication costs, not accounting for any overhead, ancillary, supplies, personnel.