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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 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.

Retail pharmacy has only about a 15% markup on average and PBMs choke all of that 15% away.

Big box stores have about a 80-100% markup.

Grocery stores have a 200% markup.

Why does everyone complain so much about healthcare prices and keep cutting our reimbursements? So PBMs and insurance companies can deny claims and get richer by killing Americans.

Medicare is putting small businesses out of business, and prohibiting new small businesses from entering the healthcare industry, especially in critical access areas, rural areas, underserved and poor minority communities. If we earn anything at all after ASP reimbursements on medications we provide to Medicare patients, there isn't enough to pay costs of equipment and supplies and salaries of healthcare staff such as nurses, assistants, techs, pharmacists, and physicians! Not with bundling, and other restrictions on billing for supplies and procedures such as nurse-provided infusions of oncology and non-oncology medications. Medicare is literally telling citizens that they cannot be treated for cancer and should die instead, and pocketing enormous kickbacks from drug companies whose price increases exceed inflation. This has to be illegal, immoral, unethical, unacceptable in a free-market and a free country.