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The American Pharmacists Association (APhA) appreciates the opportunity to provide comments to CMS under the notice “Medicare Transaction Facilitator for 2026 and 2027 under Sections 11001 and 11002 of the IRA.” APhA shares CMS’s goal of ensuring patients have affordable access to medications. However, APhA has significant concerns regarding the financial and operational challenges pharmacies will face following the implementation of the Medicare Drug Price Negotiation Program and the Medicare Transaction Facilitator (MTF) system. The current framework mandates that plan sponsors require pharmacies to be enrolled in the MTF Data Module (DM), subjecting pharmacies to significant financial losses and forcing them to float the costs of the program’s operation while waiting for reimbursements that may also be lower than their acquisition costs. These two aspects, along with the others raised in our comments, if not addressed, will contribute to more pharmacies closing across the country, making it more difficult for patients to access the medications within the confines of this program and the essential care and services that pharmacists provide to their communities.

APhA is the only organization advancing the entire pharmacy profession. APhA represents pharmacists, student pharmacists, and pharmacy technicians in all practice settings, including but not limited to community pharmacies, hospitals, long-term care facilities, specialty pharmacies, community health centers, physician offices, ambulatory clinics, managed care organizations, hospice settings, and government facilities. Our members strive to improve medication use, advance patient care, and enhance public health.