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Dear Director Parham:

The Pharmaceutical Research and Manufacturers of America (PhRMA) appreciates the opportunity to provide comments to the Centers for Medicare & Medicaid Services (CMS, the Agency) on the second round Information Collection Request (ICR) for the Medicare Transaction Facilitator for 2026 and 2027 under Sections 11001 and 11002 of the Inflation Reduction Act (IRA), which CMS released on April 1, 2025. PhRMA represents the country's leading innovative biopharmaceutical research companies, which are focused on developing innovative medicines that transform lives and create a healthier world. Together, we are fighting for solutions to ensure patients can access and afford medicines that prevent, treat and cure disease. Over the last decade, PhRMA member companies have invested more than \$800 billion in the search for new treatments and cures, and they support nearly five million jobs in the United States.

In the attached PDF dated May 1, 2025, PhRMA provides comments and requests for clarity across Appendix B (the Primary Manufacturer MFP Effectuation Plan Form), Appendix C (the Primary Manufacturer Payment Elements Form), and the Complaint Information Request Form for Non-MTF Users. In addition to this feedback, we have attached our comments from December 2024 (attached file dated December 20) on the first round MTF ICR forms, including comments on the required mitigation plans for pharmacies identifying as having material cashflow concerns and comments on the Agency holding Primary Manufacturers responsible for other distinct corporate entities ("Secondary" manufacturers) to make discounts available, as PhRMA continues to have concerns with many of the MTF ICR forms and requirements.