

# National Home Infusion Association



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Date: 12.02.22

Ms. Seileen Mullen  
Acting Assistant Secretary of Defense for Health Affairs  
Defense Health Agency  
7700 Arlington Blvd.  
Falls Church, VA 22042-5101

Dear Ms. Mullen:

The National Home Infusion Association (NHIA) is writing to provide an update on the recent efforts by Express Scripts (ESI) to narrow the TRICARE pharmacy network. NHIA is a trade association that represents companies that provide infusion therapy to patients in their homes, as well as companies that manufacture and supply infusion and specialty pharmacy products. In our previous communication sent September 26, 2022, we relayed concerns of disruptions in service for thousands of TRICARE patients that received letters from ESI stating the local home infusion pharmacy they currently use will not be in network as of October 24, 2022. Patients were instructed to change their pharmacy to Accredo Pharmacy, a mail order pharmacy owned by ESI.

We understand that ESI has since communicated by fax with a small selection of home infusion providers stating they will have an opportunity to rejoin the ESI network and to watch for a future faxed correspondence on or around December 1, 2022. Unfortunately, most home infusion pharmacies have been left out of this opportunity, including many that are locally owned and operated. For those who have received notices, NHIA learned from a press release issued by ESI on November 14, 2022, that the effective date of these agreements will be January 15, 2023, if the pharmacy executes and returns the exhibit within 15 days of the fax notice. ESI does not indicate how pharmacies should respond to patient requests for service until network access is restored (presumably on January 15, 2023) and ESI did not indicate if they have sent updated communications to TRICARE beneficiaries explaining the situation and offering to allow them to continue using their local providers during this transition period. These gaps and inconsistencies have caused enormous confusion and anxiety for TRICARE beneficiaries and the providers responsible for their care. This exceptional lack of transparent communication with both patients and providers by ESI is resulting in disruptions in care that are unnecessary and preventable.

As we stated in our previous letter, home delivery mail order programs are not sufficient to meet the needs for infusion therapies (I.e., immune therapies, IV biologics) which often require sophisticated aseptic preparation and administration by a health care professional. Specialty therapies that require IV or subcutaneous infusion require the provision of compatible administration supplies and equipment/pumps to facilitate infusions. Home infusion also requires close coordination between the pharmacy and a qualified nursing provider experienced in biologic infusions to ensure patient safety by preventing and/or managing adverse infusion-related reactions. For these reasons, we believe the recent efforts by ESI to force patients to use a single mail-order pharmacy fall short of the expectation that TRICARE beneficiaries have access to the full complement of services needed to ensure timely, safe, and effective infusion care.

To avoid putting our nation's service members, retirees, and their families at risk, NHIA requests the DOD take the following actions immediately:

1. Require ESI to reinstate all home infusion pharmacies to the current pharmacy network to ensure TRICARE beneficiaries do not experience gaps in service during the re-contracting process.
2. Request ESI provide the DOD with a detailed analysis of the impact of reducing the number of home infusion pharmacies on TRICARE beneficiary access to home administered IV and subcutaneously infused medications. The analysis should include details on the number of pharmacies and beneficiaries impacted, and a list of the specialty infused medications have been targeted for transition to Accredo.
3. If ESI cannot provide the analysis requested above, then require ESI to include all previously contracted home infusion pharmacies in the December 2022 invitation to re-join the network to ensure adequate beneficiary access to IV and subcutaneously infused medications and services.
4. Update DHA policies to allow for the Managed Care Support Contractors to reimburse contracted home infusion pharmacies for long term infusion drugs under the major medical benefit to avoid confusion and disruptions in treatment.
5. Require ESI to provide DOD will a comprehensive patient communication plan that outlines options for continuing treatments during and after the contracting transition and require ESI to respond to NHIA in writing regarding the status of our requests.

Again, NHIA encourages TRICARE to follow the precedent set by the Medicare Part D prescription drug program regarding home infusion pharmacy services and require ESI to ensure their network includes enough locally based infusion pharmacies capable of providing the unique professional pharmacy and nursing services associated with these medications.

Our nation's service members, retirees, and their families, deserve a robust network that can meet their needs in a timely manner, not just for the drug itself, but all the products and services that only a home infusion provider can bring to the table to safely delivery these complex therapies in the home.

NHIA thanks you for your attention to this matter. Please feel free to contact myself ([connie.sullivan@nhia.org](mailto:connie.sullivan@nhia.org)) or NHIA's SVP of Reimbursement Policy Bill Noyes at [Bill.Noyes@nhia.org](mailto:Bill.Noyes@nhia.org) or 703-933-0001 should you have any questions.

Sincerely,



Connie Sullivan, BSPHarm  
President and CEO

CC: U.S. Representative Buddy Carter (R-GA)  
U.S. Senator Tom Cotton (R-AR)  
Amy Bricker, CEO, Express Scripts