

# National Home Infusion Association

1600 Duke St. Suite 110 • Alexandria, VA 22314 • Phone: 703-755-8945  
www.nhia.org



Date: 09.26.2022

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 express our deep concern over recent activities by Express Scripts regarding the TRICARE specialty 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. As the leading voice for the home and alternate site infusion community we are writing with an urgent request that you revisit recent changes to the home/specialty infusion pharmacy network of providers allowed to service TRICARE beneficiaries. NHIA member pharmacies have reported that thousands of TRICARE patients have received letters from Express Scripts stating the local home infusion pharmacy they currently use will not be in network as of October 24, 2022 and instructing them that to avoid out of network expense premiums they should change their pharmacy to Accredo Pharmacy, a mail order pharmacy owned by Express Scripts.

We understand that home delivery mail order programs can be beneficial for some medications, such as oral and self-injectables, but mail order is 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.

Home infusion pharmacy providers take responsibility for coordinating these, and other aspects of the care (E.g., assessments, clinical monitoring for efficacy and adverse events) for patients receiving infusion therapies in the home. Transitioning a home infusion patient to a new provider is not as simple as transferring a prescription, thus NHIA is alarmed at the disruption being caused to thousands of TRICARE members who receive letters about transferring these highly complex services on very short notice, which will inevitably result in disruptions in treatment.

Upon review of the TRICARE online Specialty Care Drug List<sup>1</sup>, it appears letters were sent to patients on home infusion drugs such as infliximab, ocrelizumab, and immune globulin, which are not listed on the TRICARE information page. These letters may be an oversight, or perhaps Express Scripts is incorrectly applying its policies for oral and self-injectable

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<sup>1</sup> <https://health.mil/Military-Health-Topics/Access-Cost-Quality-and-Safety/Pharmacy-Operations/Info-for-Patients/TRICARE-Formulary/Specialty-Care-Drug-List?letter=C>

medications to highly complex home infusion drug therapies. Also, the TRICARE website states that the ESI/Accredo home delivery mandate goes into effect on January 1, 2023<sup>2</sup>, which is months later and different than the information contained in the letter patients are receiving.

NHIA also has reports from home infusion providers that sufficient notice was not provided regarding specialty network changes and opportunities for participation. Many providers stated they did not receive any notice, while others reported that they received notice for some commonly owned home infusion sites, but not others. Finally, for those that did receive notice, the timeframe given for home infusion providers to evaluate and respond was unreasonably short.

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

1. Re-evaluate the decision to force members to utilize a single pharmacy or limited pharmacy network for any drug that requires IV or subcutaneous infusion through an access device, infusion pump, and/or that requires a nurse to administer.
2. Review and clarify exactly which drugs are being included through retail and specialty home delivery and send a corrected communication to any patient using a product that is not on this list informing them of the error.
3. Repeal any network pharmacy cancellations and re-issue a notice with a sufficient response period for participation.

Finally, NHIA encourages TRICARE to follow the precedent set by the Medicare Part D prescription drug program regarding home infusion pharmacy services. Shortly after the start of the program, CMS issued guidance<sup>3</sup> requiring plans to ensure their networks include enough 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 deliver 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

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<sup>2</sup> <https://www.TRICARE.mil/CoveredServices/IsItCovered/SpecialtyDrugs>

<sup>3</sup> [https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/Downloads/HomeInfusionReminder\\_031006.pdf](https://www.cms.gov/Medicare/Prescription-Drug-Coverage/PrescriptionDrugCovContra/Downloads/HomeInfusionReminder_031006.pdf)

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