



2711 Buford Road, #268  
Richmond, VA 23235  
[www.hcpconline.org](http://www.hcpconline.org)  
804-338-5778

January 26, 2016

The Honorable Orrin Hatch  
Chairman  
Committee on Finance  
United States Senate

The Honorable Ron Wyden  
Ranking Member  
Committee on Finance  
United States Senate

The Honorable Johnny Isakson  
Senator  
Committee on Finance  
United States Senate

The Honorable Mark Warner  
Senator  
Committee on Finance  
United States Senate

**Submitted electronically to:** [chronic\\_care@finance.senate.gov](mailto:chronic_care@finance.senate.gov)

**RE: Comments on the Senate Committee on Finance Bipartisan Chronic Care Working Group Policy Options Document**

Dear Chairman Hatch, Ranking Member Wyden, Senator Isakson, and Senator Warner:

The Healthcare Compliance Packaging Council sincerely appreciates the opportunity to provide feedback to the Senate Finance Chronic Care Working Group's Policy Options Document. The HCPC is pleased to review the policy options document and we applaud the tremendous amount of groundwork being done on behalf of Medicare patients. We look forward to continuing to support your work to develop legislation that can benefit Medicare patients and others through our organization's focus on medication regimen adherence and patient safety.

Our organization, the Healthcare Compliance Packaging Council, ([www.hcpconline.org](http://www.hcpconline.org)) is a non-profit trade organization that includes packaging machinery, materials and contract service providers who strive for improved patient adherence and outcomes through packaging, the last item in patients' hands when they take their medications, so we are excited that patient adherence is being addressed in your recent policy options document, although we feel that addressing adherence only through medication synchronization for patients with chronic conditions is limiting the potential to increase adherence.

**Study on Medication Synchronization**

We support the inclusion of a medication synchronization study in the policy options document as it has the potential to bring significant value to Part D in terms of improving drug possession ratio (days

of supply on hand) but, unfortunately, the study as proposed has little to do with medication adherence. To be effective this proposal should include some manner of improved packaging (compliance prompting packaging) and/or other reminders to help patients keep on regimen. Too many past programs promoting themselves as improving medication adherence have been little more than programs to improve medication possession ratio, which is not the same thing. Improved medication possession ratio is a great measure for prescription sales but does little to help the patient take his/her medications on the right day and at the right time.

Realizing this, a mass merchandiser/pharmacy chain has switched virtually all of its generic prescription drugs, many for chronic conditions, to a calendarized, compliance-prompting package. A study on this change to a patient reminder package was conducted to measure prescription refill adherence and persistence for daily, self-administered, long-term medication use. The study group involved 76,321 new users and 249,040 current users, aged 18 – 75 years, who filled prescriptions for oral lisinopril or enalapril (control group), both of which are used to treat hypertension/high blood pressure, during 1 year prior and after the switch of lisinopril packaging from vials to a calendarized 30-day, unit-of-use medication package. Those patients switched to the calendarized 30-day unit-of-use medication format demonstrated improvement in the adjusted estimates of refill persistence and adherence as measured by length of therapy (LOT) and proportion of days covered (PDC) with medication. In addition, the study revealed that the calendarized 30-day, unit-of use medication package users were more likely to reach “full refill adherence” – at least 80% of days covered with medication in a year – than vial users, with the greatest effect observed in new medication users. The conclusion reached by the researchers: “Calendarized Blister Packaging of medication prescribed for daily, self-administered, long-term use was associated with modest improvement in prescription refill adherence and persistence. An adherence strategy of even small effect size that is broadly implemented on a population level could significantly leverage therapeutic effect and provide substantial cumulative public health benefit.”<sup>1, 2</sup>

---

<sup>1</sup> A Pharmacoepidemiologic Analysis of the Impact of Calendar Packaging on Adherence to Self-Administered Medications for Long-Term Use. *Clinical Therapeutics*, May 2011, Vol. 33, Number 5.

<sup>2</sup> Improving Medication Adherence Through Packaging, Two-Plus Decades of Research Studies Support Improved Patient Adherence With Calendarized, Compliance-Prompting Packaging, HCPC Whitepaper available at [www.hcpconline.org](http://www.hcpconline.org)

Improved medication adherence comes from a combination of human and external intervention. Healthcare provider and pharmacy counsel and caregiver prompting can certainly help with adherence but reminders on the package itself prompt proper dosing with visual cues and verify doses taken, reducing the likelihood of overdosing or underdosing. When it comes to patient non-adherence, various factors are at work and coordinated, multi-pronged solutions are required.

Medication synchronization can have a positive impact on improving adherence but more needs to be done with the prescription package, the last item in the hands of patients when taking their medication, to improve adherence, reduce overall healthcare costs and improve patient outcomes.

The HCPC is honored to have the opportunity to provide feedback on the recently provided Chronic Care Working Group Policy Options Document. We would like to urge the committee, as we did in June 2015, to consider that a complete solution designed to improve chronic condition Medicare patient outcomes will include modernized patient adherence packaging as an integral component. The HCPC stands ready to bring forward ideas on adherence solutions for those afflicted with chronic illnesses.

Sincerely,

A handwritten signature in black ink that reads "Walt Berghahn". The signature is fluid and cursive, with a long horizontal stroke at the end.

Walt Berghahn  
Executive Director  
Healthcare Compliance Packaging Council  
[waltberghahn@yahoo.com](mailto:waltberghahn@yahoo.com)  
cc: victoriawelch@hcpconline.org