

Barbara J. Hengstebeck, President  
Alice H. Hedt, Executive Director

1828 L Street, NW, Suite 801, Washington, D.C. 20036  
202.332-2275; Fax 202.332-2949; [www.nursinghomeaction.org](http://www.nursinghomeaction.org)

March 28, 2006

Dr. Mark McClellan  
Administrator  
Centers for Medicare and Medicaid Services  
Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20001

Dear Dr. McClellan:

The undersigned participants in the Campaign for Quality Care, a coalition of national organizations that work together on issues related to care in nursing homes, are writing to request an additional 90-day extension of the Medicare Part D transition period for Medicare beneficiaries who reside in long-term care facilities.

In the March 16, 2005, transition guidance document, CMS recommended that Part D sponsors provide a transition period of 90 -180 days for long-term care residents. We believe that the full 180 days is needed to provide additional time to address unique issues related to Medicare Part D and long-term care. We are also concerned that operational challenges associated with the initial launch of Part D have hindered the ability of long-term care facilities, physicians, and long-term care pharmacies to work together and prepare for the coming changes. Formulary restrictions and utilization management tools, such as prior authorization, would impose an untenable burden on physicians who care for long-term care residents if additional transition time is not provided.

We urge you to extend the transition period for long-term care for an additional 90 days, and to announce this extension prior to March 31. In addition, we would like to renew our request of February 15 to meet with you so that we can work together to smoothly integrate Medicare Part D for long-term care residents.

Thank you very much for your consideration.

Sincerely,

Janet C. Wells

On behalf of:

Alliance for Retired Americans  
American Association for Geriatric Psychiatry  
American Association of Homes and Services for the Aging  
American Geriatrics Society  
American Federation of State, County and Municipal Employees  
American Nurses Association  
American Society of Consultant Pharmacists  
Catholic Health Association of the United States  
Center for Medicare Advocacy  
Institute for Palliative & Hospice Training, Inc.  
National Association of Directors of Nursing Administration  
National Citizens' Coalition for Nursing Home Reform

cc Julie Goon  
Elizabeth Kegler