



NATIONAL ASSOCIATION OF  
CHAIN DRUG STORES

Steven C. Anderson, IOM, CAE  
President & Chief Executive Officer

October 19, 2011

The Honorable David Vitter  
United States Senate  
Washington, DC 20510

Dear Senator Vitter:

I am writing to express concerns with Senate Amendment 769, your amendment to prohibit the Food and Drug Administration from preventing an individual, not in the business of importing a prescription drug, from importing prescription drugs from Canada.

NACDS shares your goal of reducing the cost of prescription drugs. However, we do not believe that consumer safety can be ensured under a prescription drug reimportation system. In addition to questions concerning the safety and effectiveness of imported drugs, individuals who obtain medications through personal importation are less likely to benefit from the professional services of their local licensed pharmacist. Prescription drug misuse and non-adherence account for as much as \$290 billion dollars annually, therefore it is more important than ever to foster relationships between patients and pharmacists.

Additionally, NACDS is very concerned about the growing problem of illegal Internet drug sellers. Your amendment would allow for reimported drugs to be sold through Internet websites, which we believe raises serious concerns. There are many illegitimate websites that are not affiliated with pharmacies that are licensed in the United States. These sites often ship unapproved, counterfeit, mislabeled, or adulterated products presenting serious health and safety concerns. We would welcome the opportunity to work with you on developing policy solutions that target these illegitimate drug sellers at chokepoints and construct appropriate barriers to their illicit activities.

Instead of pursuing importation as a way to reduce drug expenditures, we urge the consideration of policies to support cost-saving alternatives, such as greater adoption of medication therapy management (MTM). S. 274, The Medication Therapy Management Empowerment Act would improve access to MTM services for seniors in Medicare Part D, helping reduce the costs associated with medication non-compliance. In addition, one of the most effective ways to improve affordability is through the use of generic medicines, which are therapeutically equivalent, but on average cost about two-thirds less than brand name equivalents. The generic dispensing rate at retail pharmacies is 71%, which is higher than any other pharmacy practice setting. Therefore we also support

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S.1356, The Affordable Medicines Utilization Act, which would encourage states to increase generic dispensing rates in their Medicaid programs.

We look forward to continuing to work with you on policies that protect patient safety and reduce prescription drug spending. If we can be of assistance, please contact Paul T. Kelly, Vice President, Federal Government Affairs.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven C. Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steven C. Anderson, IOM, CAE  
President and Chief Executive Officer

cc: Members of the United States Senate