NACDS’ Approach

Regarding COVID-19, the National Association of Chain Drug Stores (NACDS) is implementing our plan that involves four key goals:

- contributing to the health and well-being of the public, of member companies’ pharmacists and other personnel, and of NACDS’ staff team;
- delivering value to NACDS members on topics related to COVID-19;
- living up to pharmacy’s reputation of professionalism, trust and accessibility; and
- continuing to advance vigorously NACDS’ mission and 2020 Strategic Vision.

Collaboration with Government and Coalitions

NACDS recognizes and thanks the leaders and experts at all levels of government who are working for everyone’s well-being. We have been in active communication with federal agencies, including:

- the Centers for Disease Control and Prevention (CDC);
- the Department of Health and Human Services;
- the Federal Emergency Management Agency;
- the Agency for Toxic Substances and Disease Registry;
- the National Response Coordination Center; and
- the National Business Emergency Operations Center.

In addition to our ongoing collaboration, we appreciate that CDC has participated in three conference calls with NACDS members to provide an update on the situation and to answer questions. In one call with CDC, agency representatives emphasize the importance of pharmacies, and urged a focus on four areas: maintaining business continuity by following sanitization procedures; helping to keep patients and customers healthy; helping to keep employees healthy; and maintaining close engagement with local officials and awareness of the specific situations in each specific community. In addition to our engagement with government entities, we also are collaborating with the private-sector Healthcare Ready coalition.
NACDS Advocacy: Enhancing Patients’ Access to Care and Fostering Business Continuity

At the request of leaders in the federal and state governments, NACDS has provided public policy recommendations. The recommendations seek to enhance patients’ access to care and to foster business continuity amid COVID-19.

NACDS summarized all of our recommendations, which are detailed below, in an open letter to the White House, to the Congressional leadership and to the governors. The open letter describes the patient-care barriers that need to be removed to assure pharmacies and pharmacists are fully prepared to assist at this crucial time. Specifically, pharmacies and pharmacists can help those affected by COVID-19, and those with other illnesses who otherwise may be left beside an overwhelmed healthcare system. Barriers that need to be removed include those that may affect pharmacy continuity, access to medication therapy, and the ability of pharmacists to administer COVID-19 tests and COVID-19 vaccinations – once developed.

**NACDS Advocacy: Federal Policy**

Regarding federal policy recommendations, NACDS on March 16, 2020, sent a letter to the U.S. Congressional leadership and to the Administration, urging immediate steps to further optimize the critical role pharmacy plays in helping to respond to this national emergency.

NACDS’ recommendations for necessary federal policy changes relate to pharmacy services and to pharmacy staffing, credentialing, operation and workflow:

- In anticipation of a COVID-19 vaccine, NACDS urged taking action now to assure pharmacists can make it available quickly and efficiently. NACDS also urged provider status for pharmacists to empower them to deliver patient services related to COVID-19 and to other illnesses to help relieve pressures on other providers. Similarly, enhancing pharmacists’ testing authority to initiate treatment for flu, strep and minor ailments, and allowing pharmacists to conduct therapeutic interchange and substitution amid drug shortages, would improve access and relieve burdens on the national healthcare system.

- NACDS’ operational recommendations relate to diverse topics to ensure the public’s access to medications including: temporary operations in areas not designated by permit; authorization of central fill operations; allowing pharmacists and pharmacy technicians to operate across state lines; providing relief from proof-of-delivery requirements to maintain social distancing during delivery; allowing remote prescription verification by licensed pharmacies; the ability to dispense early refills and emergency refills for maintenance medications; enabling telepharmacy; and including community pharmacists in the distribution of personal protective equipment.

NACDS also joined with other pharmacy organizations in releasing a joint set of policy recommendations.

**NACDS Advocacy: State Policy**

On March 18, 2020, NACDS released state policy recommendations, which can be pursued through executive orders, proclamations and declarations. The recommendations relate to the enhancement of
access to pharmacist-provided care and testing; to pharmacy viability; and to pharmacy operations, including credentialing and workflow. The complete array of two dozen specific state-policy recommendations include, but are not limited to topics such as:

- COVID-19 testing
- Initiating care for flu, strep and minor ailments
- Pharmacists’ ability to help overcome any drug shortages that may arise
- Vaccination access
- Strategies to maintain pharmacists’ health
- Reducing administrative burdens and barriers to care
- Billing infrastructure
- Eliminating direct and indirect remuneration (DIR) fees during this pandemic
- Pharmacy technician duties
- Permitting, licensure and central fill policies
- Prescription policies related to 90-day supply, early refill and emergency refill.

On March 25, 2020, NACDS welcomed recommendations by the Trump Administration to state governors on how to empower healthcare professionals to meet Americans’ needs amid COVID-19.

Pharmacies and Public Health Situations

The American people trust pharmacies and pharmacists for information about medications, and about other issues of health and wellness. The public appreciates the accessibility of pharmacies and pharmacists, and knows pharmacies and pharmacists have been there for them before. For example, especially during the H1N1 flu outbreak of a decade ago, consumers and authorities alike really came to appreciate the ability of pharmacists to serve as highly accessible sources for vaccinations. They also have appreciated in recent years the ability of pharmacies and pharmacists to help provide hard-to-find medications such as those used to treat the symptoms of the flu. Pharmacies also are known for their dedication amid natural disasters, from hurricanes to wildfires.

Pharmacies’ Response to COVID-19

NACDS members are implementing their company-specific plans that guide all aspects of their operations. This includes executing their valuable role in helping the nation, communities and individuals amid a public health situation like this.

Pharmacies’ Response: Product Supply

Some of the most frequently asked questions relate to the supply of various products. Some products that are currently in extremely high demand obviously will be the subject of supply shortages. NACDS chain members are working closely with suppliers to manage these situations to best meet the needs of customers, and to consider alternatives when appropriate.

Pharmacies’ Response: Medication Supply
Regarding medications, NACDS is closely monitoring reports of the Food and Drug Administration and other trusted sources. We understand that there are 20 active pharmaceutical ingredients or finished drug products only sourced in China. These are considered non-critical drugs and there is no reported shortage at this time. Given the evolving global COVID-19 pandemic, we ask states to proactively plan for a potential drug shortage situation – and remove needless administrative barriers to ensure access to medications for patients.

**Pharmacies’ Response: Medication Supply - Hydroxychloroquine/Chloroquine**

On March 20, 2020, NACDS issued a statement specific to the fact that we have heard pharmacies are seeing an increase in prescriptions being written for Hydroxychloroquine/Chloroquine. In addition, some state boards of pharmacy also have been made aware of this situation.

As a result, some state boards of pharmacy have contacted pharmacies to encourage pharmacists to exercise professional judgment in dispensing this drug to those who have a medically appropriate reason to have it, rather than simply to have it on hand “just in case.” The boards’ outreach focuses on ensuring that Hydroxychloroquine/Chloroquine remains available to those relying on it already for Food and Drug Administration-approved indications, such as lupus. The boards also note that availability of the drug may be most beneficial for high-risk individuals diagnosed with COVID-19. Some state boards of pharmacy and governors have taken action to issue temporary rules to restrict dispensing of this drug.

We are confident that state medical societies and the vast majority of prescribers will adhere to professional standards and to the best interest of public health and the health of individual patients. Our nation, our communities, our patients, and our pharmacists who are doing so much on the front lines of healthcare deserve that. We stand with all healthcare providers and with everyone in our communities to preserve public health and wellness at this time and always.

The American Medical Association, the American Pharmacists Association and the American Society of Health-System Pharmacists issued a joint statement on this topic.

**Pharmacies’ Response: Flow of Information**

Because the empowering effect of information is vital in situations like this one, NACDS encourages public health officials to maintain the flow of the latest information. This information is very important to the public, and to the pharmacists and other pharmacy personnel who help to address patients’ questions and concerns.

**Pharmacies’ Response: Pharmacy Procedures**

The Centers for Disease Control and Prevention (CDC) has provided guidance to pharmacies – which provide guidance for activities such as filling and dispensing medications, and for close-contact pharmacy care services. This information, and more, is available at NACDS.org/Prepared.

Regarding social distancing, examples of companies’ efforts to aid in this practice include using drive-through windows and delivery to minimize the potential for contact, and using store design features to separate patients. As necessary, pharmacies are putting into practice their pandemic plans, which have been informed by prior experiences over the past decade, including H1N1 flu. They also are using resources that are available from global and national organizations that assist in evaluating the appropriate ways to engage with patients.
Of course, member companies continue to monitor the situation and to engage with health authorities to obtain the latest information so that any new recommended procedures can be identified and implemented as more is learned about COVID-19 specifically.

Information about NACDS member companies’ COVID-19 efforts can be found at NACDS.org/COVID-19.