



Expanding Access to Patient Care and Ensuring Community Pharmacy Continuity of Operations

To address the coronavirus (COVID-19) pandemic, we urge governors and their state teams to ensure continuity of patient care during this pandemic by removing needless barriers and restrictions, we offer several recommended priorities for inclusion in state executive orders. We urge governors and their state teams to consider and act upon these recommended priorities to ensure Americans have broad, uninterrupted access to care and medications they need at pharmacy healthcare destinations.

Recommended Priorities: State Executive Orders, Proclamations and/ or Declarations:

- **Business Continuity: Expanded Efficiencies**
 - Authorize remote pharmacy operations by pharmacists and pharmacy technicians to address absenteeism, call outs, closings and efficiency of resources, including:
 - Authorize central fill/central databases/processing/shared services operations to facilitate patient access to medications
 - Other operations across state lines to ensure business continuity
 - Prescription data entry and script/product verification among others); and
 - Waive technician ratios
 - Authorize significant expanded authority for pharmacy staff, including:
 - Allow pharmacy technicians to transfer prescriptions, verbal orders and clarifications
 - Allow technician product verification (TPV) otherwise known as tech-check-tech
 - Technician Immunizations
 - Allow pharmacy technicians to accept and document the refusal of patient counseling
 - Authorize implementation of central fill/central databases/processing/shared services operations to facilitate patient access to prescription medications
 - Authorize pharmacies to temporarily operate in non-designated permitted locations
 - Provide grace period for pharmacy staff to renew licenses, accreditations and/or certifications (i.e., CPR certification, technician certification, CE requirements)
 - Remove/waive proof of delivery requirements for pharmacists (e.g., collect patient signature upon delivery or mailing of a prescription during emergency period)
 - Allow pharmacy to confirm delivery of medications through phone call, text or email, in lieu of a signature
 - Remove delivery location restrictions and signature requirements, including controlled substances
 - Waive mandatory face-to-face patient counseling to minimize infections
 - Waive requirements for notifying a board and public when a pharmacy must close
 - Designate pharmacist personnel and delivery folks be considered essential personnel during periods of enforced travel restrictions
- **Expand Access to Care & Testing: Pharmacies as Healthcare Destinations**
 - Authorize pharmacists and pharmacy technicians with valid licenses to operate across states other than where their license was issued to provide services physically and remotely

- Ability to dispense early refills and emergency refills for maintenance medications (no controls). Expand emergency refill allowance from 72-hour supply/30-day supply to 90-day supply.
- Ability to fill 90-day prescriptions for maintenance medications that currently do not allow pharmacist conversion
- Authorize pharmacists to partner with federal, state, and local authorities to conduct COVID-19 testing, administer vaccines, and initiate treatment
- Authorize pharmacists to expand access to care initiate treatment for flu, strep, minor ailments (hormonal contraceptives et al) and preventive care (PrEP et al). To stretch hospital and acute care setting resources
- Expand/waive current state pharmacist immunization authority to include all CDC/ACIP-recommended and FDA sanctioned vaccines for all ages, including the forthcoming novel vaccine for COVID-19
- Authorize pharmacists to conduct therapeutic interchange and substitution without authorization of a physician when and if product spot or shortages arise
- Authorize prescription adaption for pharmacists
- Eliminate refill prior authorizations by third parties; called Standard Submission Clarification Codes. Some third parties are requiring pharmacies to call third-party help desks for overrides, which cause significant delays and major administrative burdens for pharmacy staff
- Waive PBM restrictions on mail delivery by retail pharmacies

- **Reimbursement**
 - Co-pay waivers for essential, life-sustaining medications (e.g. insulin, among others) are implemented based on specific days supply (i.e., 14-day or 30-day supply). Given instances of drug shortages/rationing, copay waivers should be implemented regardless of a specific days supply amount, and pharmacies should be reimbursed for the cost of dispensing
 - Execute infrastructure for pharmacies/pharmacists to receive appropriate coverage and reimbursement for the provision of care services
 - Waive PBM recoupment fees related to performance networks and quality measures (e.g. GDR, 90-day fills et al)

- **Drug Shortages**
 - Waive requirements to facilitate the transportation of essential medication within and among states to address spot shortages or product shortages
 - Waive FDA restrictions on compounding pharmacies