

Steven C. Anderson, IOM, CAE

President & Chief Executive Officer

March 16, 2020

Vice President Mike Pence
The White House
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

The Honorable Nancy Pelosi
Speaker of the House
United States House of Representatives
1236 Longworth House Office Building
Washington, DC 20515

The Honorable Mitch McConnell
Majority Leader
United States Senate
317 Russell Senate Office Building
Washington, DC 20510

The Honorable Kevin McCarthy
Minority Leader
United States House of Representatives
2468 Rayburn House Office Building
Washington, DC 20515

The Honorable Charles Schumer
Minority Leader
United States Senate
322 Hart Senate Office Building
Washington, DC 20510

Dear Vice President Pence, Leader McConnell, Minority Leader Schumer, Speaker Pelosi, and Minority Leader McCarthy:

As Congress and the Administration consider new policies and initiatives to combat the threat of COVID-19, I am writing to urge you to take steps immediately to further optimize the critical role pharmacy plays in helping to respond to this national emergency.

As was the case with situations ranging from the prior H1N1 flu situation to natural disasters, pharmacies have been highly proactive in preparing and engaging on COVID-19 response. Consumers and authorities alike have come 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. However, pharmacies can provide additional services and resources that can be utilized to further strengthen national emergency response capabilities as a trusted health care provider which provides unparalleled access to those populations that need assistance the most.

These additional policy proposals would further enable pharmacy to help expedite and maximize our national response. We recommend the following:

Pharmacy Services

Important pharmacy services should be authorized and expanded to help deal with the COVID-19 outbreak as well as deliver increased provider capacity as health care resources are further stressed by the national response to this crisis:

- **Pharmacist Immunization Authority for COVID-19** - Pharmacists' well-documented experience and capability in successfully providing immunizations should be utilized to ensure that any COVID-19 vaccine is accessible and provided as quickly as possible. We urge that notwithstanding any other federal or state law, pharmacists should be authorized to initiate and administer medications (including injectables), biologicals, and vaccines to patients of any age that are indicated for immunizations authorized by the FDA as a treatment or vaccine for COVID-19.
- **Pharmacist Provider Status** – Establishing pharmacists as providers in Medicare Part B can further bolster an important access point for care for those afflicted by COVID-19 as well as supplement a national health care system that may be severely overtaxed by the response to the virus. The Secretary should authorize that pharmacists be recognized as providers under Medicare Part B subject to state scope of practice laws in order to assist in the response to the COVID-19 outbreak.
- **Testing** -To preserve scarce hospital and acute setting resources, expand access to accessible care by allowing pharmacists to initiate treatment for flu, strep, and minor ailments.
- **State pharmacist immunization authority** - State pharmacist immunization authority should be expanded/waived to include all CDC/ACIP-recommended and FDA sanctioned vaccines, including the forthcoming novel vaccine for COVID-19 for all ages.
- **Therapeutic Interchange to Address Drug Shortages** - Pharmacists should be authorized to conduct therapeutic interchange and substitution without authorization of a physician when and if product shortages arise.
- **Pharmacist-Compounded Hand Sanitizer:** Waive distribution or proof restrictions to temporarily allow pharmacies to purchase certain high proof spirits for the sole purpose of compounding alcohol-based hand sanitizer products, for their use only, as permitted under FDA guidance during this public health emergency. The waiver would allow the purchase by stores/pharmacies that do not currently possess spirit licenses and remove any proof restrictions (able to sell over 100 proof).

Pharmacy Staffing/Credentialing/Operation/Workflow

The following recommendations would provide pharmacists with increased flexibility to deliver essential services to those impacted by COVID-19 and scarce health care resources:

- Authorize pharmacies to temporarily operate in an area not designated by permit.
- Authorize implementation of central fill operations to occur in pharmacy sector.
- Allow pharmacists and pharmacy technicians with valid licenses to operate across states other than where their license was issued to provide services.
- Remove/waive proof of delivery requirements for pharmacists (e.g., collect patient signature upon delivery or mailing of a prescription during emergency period). Consider mirroring New York's Medicaid Pharmacy Guidance that allows pharmacy to confirm delivery of medications from sick patients through phone call, text or email, in lieu of a signature.
- Allow remote prescription verification by licensed pharmacies in instances where a store cannot be staffed by a pharmacist.
- Ability to dispense early refills and emergency refills for maintenance medications (not controlled substances).
- Provide flexibility for pharmacists and technicians to work remotely when necessary by employing technology, such as telepharmacy, to facilitate dispensing of medications (allow for central fill and other pharmacists to fill in when the local pharmacists are sick)
- Include community pharmacists in the distribution of PPE supplies since many of these individuals are on the front-line providing Point-of-care-testing to individuals that may have COVID-19.

We appreciate your consideration of these important proposals that will help our nation more effectively combat COVID-19. If you have any questions concerning this request, please contact Tom O'Donnell, Senior Vice President of Government Affairs and Public Policy by email at todonnell@nacds.org or by phone at (703) 859-1787.

Sincerely,

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

CC: Members of the U.S Senate
Members of the U.S. House of Representatives
The Hon. Alex Azar, Secretary of the U.S. Department of Health and Human Services