

June 10, 2014

Open Letter to Congress in Support of Any Willing Pharmacy in the Medicare Part D Program

Dear Members of Congress,

The undersigned organizations are writing to express our unified support for allowing “any willing pharmacy” to participate in Part D preferred pharmacy networks. Although the Centers for Medicare and Medicaid Services (CMS) declined to finalize a proposed regulatory provision to this effect in the recently released final 2015 Part D rule, they included commentary expressing their continued support for this concept based on their belief that opening restrictive pharmacy networks would have significant benefits including increased access for beneficiaries to reduced copayments. CMS also stated they do not believe this proposal would result in increased prices.

Right now, seniors in many communities face either trips of 20 miles or more to reach a “preferred” pharmacy or must assume higher co-pays to use a local pharmacy they have maintained a trusted relationship with for many years. Seniors should have greater access to discounted or “preferred” co-pays at independent community pharmacies.

There has been widespread, bipartisan support from more than 30 members of Congress and numerous consumer groups for ensuring that the “any willing pharmacy” standard applies to preferred pharmacy networks. You have heard of the difficulties beneficiaries are facing when trying to find a pharmacy close by and in their preferred network, especially in rural and underserved communities. We believe that this is simply not right.

Opponents to this common sense policy claim that a proposal of this type will raise costs to the Medicare Part D program and have relied heavily on published analyses that predate the Part D program. In response, CMS cautions that “any attempt to generalize these studies to the Part D benefit would need to incorporate multiple other variables” and that “the studies submitted offer only limited explanation of what trends in utilization, pricing and care managements surrounded these studies.” In fact, an analysis of “any willing pharmacy” in the Part D program conducted by a noted healthcare economist concluded that prices under an “any willing pharmacy” policy in the Part D program could remain the same or even decline.¹

Millions of Americans currently lack sufficient access to basic healthcare services. A recent United States Public Health Service Report argued that pharmacists are “remarkably underutilized given their education, training, and closeness to the community.”² So why are pharmacies all across the country being excluded from participating in preferred pharmacy networks which would expand beneficiary access to potential cost savings?

¹ Eisenstadt David. *How CMS’ Any Willing Pharmacy Could Reduce or Leave Drug Prices Unchanged*. Mar 2014.

² Giberson S, Yoder S, Lee MP. *Improving Patient and Health System Outcomes through Advanced Pharmacy Practice*. A Report to the U.S. Surgeon General. Office of the Chief Pharmacist. U.S. Public Health Service. Dec 2011.
<http://www.usphs.gov/corpslinks/pharmacy/documents/2011AdvancedPharmacyPracticeReporttotheUSSG.pdf>

In conclusion, the undersigned organizations remain committed to ensuring that seniors have expanded access to Part D prescription medications and potential cost savings available from preferred pharmacies. We urge Congress to address this critical issue without delay.

Access-Rx America
Alabama Pharmacy Association
Alaska Pharmacists Association
Alliance of Independent Pharmacists of Texas
American Association of Colleges of Pharmacy
American Pharmacies
American Pharmacists Association
American Pharmacy Cooperative, Inc.
American Pharmacy Services Corp.
American Society of Consultant Pharmacists
AmerisourceBergen
Arizona Pharmacy Association
Arkansas Pharmacists Association
Association of Community Pharmacists
Association of Indian Pharmacists in America
Astrup Drug, Inc.
Auburn Pharmacies
Bartell Drugs
Brookshire Grocery Company
California Pharmacists Association
Cardinal Health
CARE Pharmacies Cooperative, Inc.
Caregiver Action Network
Community Pharmacy Prescription Network
Compliant Pharmacy Alliance Cooperative
Connecticut Pharmacists Association
DiCello & Associates, Inc.
Discount Drug Mart, Inc.
Doc's Drugs Ltd.
Drug Emporium
Fagen Pharmacy
Federation of Pharmacy Networks
Florida Pharmacy Association
Food Marketing Institute
Fruth Pharmacy
Georgia Pharmacy Association
GeriMed
Gerould's Professional Pharmacy
Good Day Pharmacy
GPhA Academy of Independent Pharmacy

Guardian Pharmacy
Hartig Drug
H. D. Smith Wholesale Drug Co.
HealthHIV
HealthPlan Data Solutions LLC
Hi-School Pharmacy Inc.
HomeTown Pharmacy Inc.
Idaho State Pharmacy Association
Illinois Pharmacists Association
Independent Pharmacy Alliance
Independent Pharmacy Cooperative
Innovatix, LLC
International Academy of Compounding Pharmacists
Kansas Independent Pharmacy Service Corp.
Kansas Pharmacists Association
Kentucky Pharmacists Association
Keystone Pharmacy Purchasing Alliance
King Kullen Pharmacies
Kinney Drugs, Inc.
Klingensmith's Drug Stores
Lewis Drug
Louisiana Independent Pharmacies Association
Mallatt's Homecare Pharmacy
Maryland Pharmacists Association
Massachusetts Pharmacists Association
McKesson Corp.
Medicenter Pharmacies
Merwin LTC Pharmacy
Michigan Pharmacists Association
Minnesota Pharmacists Association
Mississippi Independent Pharmacies Association
Mississippi Pharmacists Association
Missouri Pharmacy Association
Montana Pharmacy Association
Morris & Dickson Co. LLC
Mutual Wholesale Drug Company
National Alliance for Caregiving
National Alliance of State Pharmacy Associations
National Association of Chain Drug Stores
National Community Pharmacists Association
National Federation of Independent Business
National Grange
National Grocers Association
National Home Infusion Association
National Indian Pharmacy Association
National Rural Health Association
Navarro Discount Pharmacies

Nebraska Pharmacists Association
New Jersey Pharmacists Association
New Mexico Pharmacists Association
Niemann Foods, Inc.
North Dakota Pharmacists Association
North Dakota Retail Association
Northeast Pharmacy Service Corporation
Ohio Pharmacists Association
Osborn Drugs, Inc.
PAAS National
Pace Alliance
Partners in Pharmacy Cooperative
PBA Health
PCCA
Pennsylvania Pharmacists Association
Pharmacists Society of the State of New York
Pharmacists United for Truth and Transparency
Pharmacy First
Pharmacy Providers of Oklahoma, Inc.
Pharmacy Society of Wisconsin
Philadelphia Association of Retail Druggists
PPSC
QualityCare Pharmacies
Rochester Drug Cooperative, Inc.
RxPlus Pharmacies
RxPreferred Benefits
Sav Mor Pharmacies
Smith Drug Company
South Carolina Pharmacy Association
South Dakota Retailers Association
Southern Pharmacy Cooperative
Tennessee Pharmacists Association
Texas Pharmacy Association
Texas Pharmacy Business Council
Third Party Station
Thrifty White Pharmacy
University of Maryland Eastern Shore
U.S. Pain Foundation
Value Drug Company
Vermont Retail & Grocers Association
Virginia Pharmacists Association
Virginia Retail Merchants Association
Washington State Pharmacy Association
West Virginia Pharmacists Association
Wholesale Alliance, LLC
Wilkinson Pharmacy, Inc.