

March 18, 2020

The Honorable Nancy Pelosi
Speaker of the House
H-232, The Capitol
Washington, D.C. 20515

The Honorable Kevin McCarthy
House Minority Leader
H-204, The Capitol
Washington DC 20510

The Honorable Mitch McConnell
Senate Majority Leader
S-230, The Capitol
Washington D.C. 20510

The Honorable Chuck Schumer
Senate Minority Leader
S-221, The Capitol
Washington, D.C. 20515

Dear Speaker Pelosi, Minority Leader McCarthy, Majority Leader McConnell, and Minority Leader Schumer:

The nation's 21,000 community pharmacies, including independent and small regional chains which are locally and regionally owned, are located in all U.S. states and territories. As you consider legislation to combat the coronavirus (COVID-19) outbreak, please keep in mind that our members are frontline health care providers caring for patients in community and long-term care settings and stand ready to assist in fighting this pandemic.

Attached you will find community pharmacists' recommendations on how our members can help, including testing for COVID-19 as availability of diagnostic testing increases. Over 10,000 locally-owned pharmacies provide home delivery services and over 5,000 have the ability to compound necessary medications and preventative needs, such as hand sanitizer.

However, in order to remain viable and keep doors open to provide continued access and care, independent community pharmacists need an immediate elimination for 2020 of all pharmacy direct and indirect remuneration (DIR) fees that pharmacy benefit managers (PBMs) assess on pharmacies. These post point-of-sale clawbacks are wreaking havoc on the business operations of our members and are a threat to their ability to offer these services.

We also need several allowances in order to continue to provide life-saving medications to our patients in this time of emergency, such as waiving all requirements for patient signature or other delivery verification requirements that put our members and their staff and patients at increased risk of acquiring coronavirus.

NCPA asks Congress to include the recommendations in any legislative package you will be considering so that policies can be implemented in a broad, consistent manner, unlike the patchwork policies that PBMs have implemented to date.

Community pharmacies are open and ready to assist. Please contact Adam Harbison, director of congressional affairs at 256-708-7922 or adam.harbison@ncpa.org, or Karry La Violette, senior vice president of government affairs, at 703-600-1180 or karry.laviolette@ncpa.org with any questions you may have about how independent pharmacies can help our country during this urgent time.

Sincerely,



B. Douglas Hoey, RPh, MBA
Chief Executive Officer

Attachment

cc: The Honorable Chuck Grassley, Chairman, Senate Finance Committee
The Honorable Ron Wyden, Ranking Member, Senate Finance Committee
The Honorable Lamar Alexander, Chairman, Senate HELP Committee
The Honorable Patty Murray, Ranking Member, Senate HELP Committee
The Honorable Frank Pallone, Chairman, House Energy and Commerce Committee
The Honorable Greg Walden, Ranking Member, House Energy and Commerce Committee
The Honorable Richard Neal, Chairman, House Ways and Means Committee
The Honorable Kevin Brady, Ranking Member, House Ways and Means Committee

Community Pharmacists' Recommendations During COVID-19 Pandemic

The **National Community Pharmacists Association (NCPA)** represents over 21,000 community pharmacies nationwide (independent and small regional chains, locally/regionally owned), located in all U.S. states and territories.

Centralized coordination: Infrastructure is already in place (including [CPESN](#), which uses interoperable care plans) for coordinating nationally, regionally or locally, including immediate roll-out.

Impact in rural communities: Using independent community pharmacists is the best alternative for communicating and engaging with rural communities, especially since independent community pharmacists are trusted, well-established health care providers in their communities. *There are 6,400 pharmacies located in rural communities with pharmacists sometimes the only health professionals serving area residents.*

How community pharmacists can help:

- [Use local pharmacists to give the COVID-19 test.](#)
- [Provide home delivery services](#) to allow patients to stay at home. Pharmacies also have a drive-thru.
- [Compound hand sanitizer.](#) Per recently released [FDA guidance](#), thousands of local pharmacies are capable of making product available.
- [Provide up-to-date influenza and pneumonia vaccinations](#) to prevent co-occurring disease. Independent pharmacies are perfectly positioned to mass immunize once a vaccine is developed for COVID-19.
- [Test for influenza and strep](#), which assists physicians in triaging patients. Forty-four states allow for testing.
- [Prescribe medications via collaborative practice agreements](#) and keep primary care practices, emergency rooms, and hospitals clear for more serious cases.
- [Educate via dispersion of appropriate literature](#) to the public.
- [Relief of symptoms.](#) Pharmacists are providing over-the-counter (OTC) medications, supplies, and counseling.

What independent community pharmacies need to provide continued access and care:

- [Eliminate all pharmacy direct and indirect remuneration \(DIR\) fees](#) assessed on pharmacies immediately for 2020.
- [Ensure sustainability of pharmacies with reimbursement that covers acquisition cost & commensurate dispensing fee](#) in Medicaid managed care in the event of any supply chain disruptions for remainder of the year (H.R. 5281/Sec. 10206 of PDPRA).
- [Make tests for COVID-19 and protective equipment available to small business pharmacies](#) to test staff/patients.
- [Allow pharmacists to deliver or mail](#) any medication to patients' homes.
- [Ensure real-time price transparency for generic drugs](#) concerning maximum allowable costs for 2020 (H.R. 1035).
- [Allow pharmacists to compound commercially available prescriptions](#) if there are drug shortages.
- [Allow any willing pharmacy to dispense medication to seniors in underserved areas](#) (H.R. 4946).
- [Waive all audit requirements in Medicare Part D](#), specifically medication delivery documentation and signature log requirements.
- [Suspend Part D 2021 contract negotiations.](#)
- [Immediately provide readily accessible, unsecured credit](#) to employers of all sizes to ensure they have the cash to pay their workers, rent, and other costs during this crisis.
- [Suspend the filing of business returns](#) and the payment of all business taxes to the federal government.
- [Amend the Tax Code](#) to, among other items, restore the ability of businesses to carry back any net operating losses against previous year tax payments.

NCPA asks Congress to immediately implement the above policies in a broad, standardized manner, unlike the patchwork policies that PBMs have implemented to date.