

November 14, 2023

Bryan T. Cafferelli, Commissioner
Department of Consumer Protection
450 Capitol Avenue
Suite 901
Hartford, CT 06103

**RE: SUPPORT FOR REGULATIONS CONCERNING EMERGENCY AND HORMONAL CONTRACEPTIVES
TRACKING # PR2023-044**

Commissioner Cafferelli:

We thank you for the opportunity to provide comments to proposed regulations **20-XXX-1 to 20-XXX-10**, that defines educational and patient assessment standards for pharmacists' prescribing emergency and hormonal contraception. We **support** these proposed regulations as it expands access to contraception, improves public health and effectively utilizes pharmacists to deliver quality care.

NCPA represents the interest of America's community pharmacists, including the owners of more than 19,400 independent community pharmacies across the United States and 123 independent community pharmacies in Connecticut. These Connecticut pharmacies filled over 7 million prescriptions last year, impacting thousands of patients in your state. Our members are small business owners who are among America's most accessible healthcare providers, and they provide an expanding set of health care services to millions of patients every day.

We were proud to join with the Connecticut Pharmacists Association in their efforts to expand pharmacists' prescriptive authority, now joining 23 other states in granting access to contraception through community pharmacies. Over 90% of Americans live within five miles of a community pharmacy¹, which makes pharmacists uniquely positioned to reach patients who may not have an affordable or accessible way to obtain contraception.

Community pharmacists are proud to play a vital role in providing direct access to hormonal contraception. Access to pharmacy services along with contraceptives services play a critical role in improving public health and reduces the attributed costs associated with unintended pregnancies. In Oregon, this authorization helped the state avert an estimated 51 unplanned pregnancies and save \$1.6

¹ NCPDP Pharmacy File, ArcGIS Census Tract File, NACDS Economics Department.

million in the first year of implementation.² Implementation of pharmacy contraceptive services not only expands access to care but reduces local and state health expenditures.

The proposed regulations promote quality of care and patient safety by requiring training programs for emergency and hormonal contraceptive administration be accredited by the Accreditation Council for Pharmacy Education (ACPE) and include the most current version of the United States Medical Eligibility Criteria for Contraceptive Use.

NCPA supports the proposed regulations pursuant to Public Act 23-52, which created the educational and patient care standards for pharmacist independent prescriptive authority for contraception. We appreciate the Department's attention to this important issue and urge approval from the agency.

Sincerely,

A handwritten signature in black ink, appearing to read "Belawoe Akwakoku". The signature is fluid and cursive, with the first name "Belawoe" and last name "Akwakoku" clearly distinguishable.

Belawoe Akwakoku
Associate Director, State Government Affairs
National Community Pharmacists Association

² Anderson L, et.al. Pharmacist Provision of Hormonal Contraception in the Oregon Medicaid Population. *Obstet Gynecol.* 2019;133(6):1231-1237. doi: 10.1097/AOG.0000000000003286.