



Michael Preston  
SECRETARY OF COMMERCE

Alan McClain  
INSURANCE COMMISSIONER,  
ARKANSAS INSURANCE  
DEPARTMENT

**JULY 8, 2021**

**BULLETIN NO. 11-2021**

**TO: PHARMACY BENEFIT MANAGERS, HEALTH INSURERS, HEALTH MAINTENANCE ORGANIZATIONS, HOSPITAL PUBLIC SERVICE CORPORATIONS, HEALTHCARE PAYERS, AND OTHER INTERESTED PARTIES**

**FROM: ARKANSAS INSURANCE DEPARTMENT**

**SUBJECT: MAXIMUM ALLOWABLE COST APPEALS TO THE ARKANSAS INSURANCE DEPARTMENT ("AID")**

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The Arkansas Insurance Commissioner ("Commissioner") issues this Bulletin to all Arkansas licensed pharmacy benefit managers ("PBMs") regarding complaints, appeals, or inquiries made to AID by pharmacies, following a pharmacy's maximum allowable cost ("MAC") appeal denial by a PBM.

A recent review of post MAC appeal complaints by several pharmacies to AID reveals that, in many cases, a pharmacy has filed a complaint with AID following a denial of a MAC appeal, and the sole basis for the denial, or justification by the PBM, in the record for the denial and payment below acquisition cost is that the pharmacy was paid at its generic effective rate ("GER") rate, or contracted rate, with the PBM. Following the appeal denial, the complaint or inquiry is then made by the pharmacy to AID against the PBM. Ultimately, after a complaint is filed with the regulator, the PBM agrees with AID to make the necessary reimbursement adjustments consistent with the MAC law to the pharmacy's acquisition cost ("PAC"), for the drugs challenged in the MAC appeal. AID has processed these complaints following this pattern and required PBMs to make these adjustments to the pharmacy's inventory cost, without fines or penalties, for PAC adjustments which should have been made during the MAC appeal itself.

The purpose of this Bulletin is to advise and provide notice to PBMs that AID will no longer simply resolve the complaint by requiring the adjustments to PAC to occur following the appeal and processing by AID without a fine or penalty, if the denial by the PBM in the MAC appeal is solely due to contracted rate agreements.

Under the MAC law (Ark. Code Ann. §§ 17-92-507 et seq.), a pharmacy is entitled to appeal its MAC reimbursement to achieve or obtain reimbursement at least to the level of its PAC. The law makes no exception to permit below acquisition cost reimbursement because of the GER rate. The

fact that the pharmacy and PBM agreed to a GER rate, which supposedly governs the MAC reimbursement, is not germane to override the legal requirement in the MAC law requiring the pharmacy to at least be reimbursed its acquisition cost in the MAC appeal, regardless of GER. See Ark. Code Ann. § 17-92-507(c)(4).

AID takes the position that the PBM is not providing a reasonable administrative appeal under Ark. Code Ann. § 17-92-507(c) if the MAC reimbursement is below the pharmacy's PAC, and a MAC appeal denial is solely due to GER or contracted rate responses. PBMs should correct their MAC system appeals now to recognize and adjust their reimbursement in MAC to the pharmacy's inventory cost to avoid having the pharmacy and AID later process what is essentially an unnecessary complaint which should have been corrected during the MAC appeal.

PBMs are henceforth on notice, following the date of this Bulletin, that AID will now seek fines or penalties, if a pharmacy has filed a complaint with AID based on below PAC reimbursement, and the MAC denial is stated by the PBM to be due to GER rate or contracted rate differences. Pursuant to Ark. Code Ann. § 17-92-507(g)(1), a violation of the Maximum Allowable Cost law, shall be considered a prohibited practice under the Arkansas Insurance Department's Trade Practices Act, Ark. Code Ann. § 23-66-201 et seq.

The Commissioner presumes that, in the above cases, the pharmacy, or its pharmacy services administrative organization ("PSAO"), has submitted to the PBM in the MAC appeal, the pharmacy's inventory or acquisition costs in the MAC appeal, or is otherwise submitting all of the necessary information of its billing invoice for the PBM to make the PAC adjustment. PAC is defined under Ark. Code Ann. § 17-92-507 to mean "the amount that a pharmaceutical wholesaler charges for a pharmaceutical product *as listed on the pharmacy's billing invoice.*" (Emphasis added.) The law does not permit or allow the PBM to request additional agreements or discount information as a basis for denial of the MAC appeal. AID will take the position that, if the PBM denies the MAC appeal because additional agreements are not submitted in the appeal, beyond the billing invoice, the PBM is not providing a reasonable administrative appeal in violation of Ark. Code Ann. § 17-92-507(c).

  
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ALAN McCLAIN  
INSURANCE COMMISSIONER  
STATE OF ARKANSAS

7-8-2021  
DATE





Michael Preston  
SECRETARY OF COMMERCE

Alan McClain  
INSURANCE COMMISSIONER,  
ARKANSAS INSURANCE  
DEPARTMENT

AUGUST 27, 2021

**BULLETIN NO. 13-2021**


**TO: PHARMACY BENEFIT MANAGERS, HEALTH INSURERS, HEALTH MAINTENANCE ORGANIZATIONS, HOSPITAL PUBLIC SERVICE CORPORATIONS, HEALTHCARE PAYERS, AND OTHER INTERESTED PARTIES**

**FROM: ARKANSAS INSURANCE DEPARTMENT**

**SUBJECT: "NADAC" PRICING MINIMUMS**

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The Arkansas Insurance Commissioner ("Commissioner") issues this Bulletin to all Arkansas licensed pharmacy benefit managers ("PBMs") regarding national average drug acquisition cost ("NADAC") pricing minimums. Pursuant to Ark. Code Ann. 23-92-506(b)(5), under the PBM Licensure Act, "a pharmacy benefits manager or representative of a pharmacy benefits manager shall not pay or reimburse a pharmacy or pharmacist for the ingredient drug product component of pharmacist services less than the national average drug acquisition cost or, if the national average drug acquisition cost is unavailable, the wholesale acquisition cost." Violation(s) of the provisions of the Arkansas Pharmacy Benefit Manager Licensure Act are considered to be trade practice violations under Arkansas Insurance Department Rule 118 under Section 11. PBMs need to immediately correct their systems to establish NADAC minimum claims practices or face enforcement and violation actions. Please also be advised that the NADAC requirements now apply to all PBMs administering plans for "healthcare payors," which includes self-funded employer plans.

  
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ALAN McCLAIN  
INSURANCE COMMISSIONER  
STATE OF ARKANSAS

8-27-21  
\_\_\_\_\_  
DATE

FILE	PBM	PHARMACY	DATE CLOSED	RECOVERY			
JAN							
139786	Caremark	Soos	1/11/2021	\$45.90	MAC		
139789	Caremark	Medishop	1/11/2021	\$8.02	MAC		
139696	Caremark	Medishop	1/12/2021	\$7.39	MAC		
139715	Caremark	Medishop	1/12/2021	\$11.42	MAC		
139852	Caremark	Soos	1/14/2021	\$40.04	MAC		
139866	Caremark	Burrows Drug	1/20/2021	\$80.00	MAC		
139880	Magellan	Smith Family	1/20/2021	\$4.30	NADAC		
139791	Magellan	Smith Family	1/20/2021	\$17.64	NADAC		
139790	Express	Soos	1/20/2021	\$10.85	MAC		
140044	Caremark	Soos	1/27/2021	\$24.22	MAC		
140146	Caremark	Soos	1/27/2021	\$14.06	MAC		
139693	Caremark	American Drugs	1/28/2021	\$118.60	MAC		
140174	Caremark	Soos	1/28/2021	\$13.44	MAC		
				\$395.88			
FEB							
140188	Caremark	Burrows	2/1/2021	\$2.78	MAC		
140100	Caremark	CYF	2/1/2021	\$56.26	MAC		
140048	Caremark	Soo's	2/1/2021	\$17.18	MAC		
124423	Optum	Soo's	2/3/2021	\$29.96	MAC		2018
139851	Optum	Soo's	2/3/2021	\$2.99	MAC		
140243	Caremark	Soo's	2/9/2021	\$63.58	MAC		
140117	Express	Soo's	2/9/2021	\$347.68	MAC		
139878	Express	Medishop	2/16/2021	\$1.45	MAC		
126890	Optum	Soo's	2/16/2021	\$146.00	MAC		reopened
140143	Optum	Soo's	2/17/2021	\$38.19	MAC		
140273	Caremark	Soo's	2/17/2021	\$273.79	MAC		
139733	Optum	Achor	2/18/2021	\$207.41	MAC		
140099	Caremark	Soo's	2/8/2021	\$48.53	MAC		
139867	Optum	Medishop	2/19/2021	\$96.56	MAC		
140305	Express	Soo's	2/19/2021	\$2.01	MAC		
140213	Optum	Medishop	2/22/2021	\$3.40	MAC		
140526	Optum	Soo's	2/24/2021	\$110.84	MAC		
140527	Optum	Soo's	2/24/2021	\$53.72	MAC		
140542	Optum	Medishop	2/24/2021	\$14.00	MAC		
140572	Optum	Soo	2/24/2021	\$93.90	MAC		
				\$1,610.23			\$2,006.11





APRIL									
140991	Caremark	Medishop	4/7/2021	\$73.91	MAC				
141044	Caremark	Burrows Drug	4/7/2021	\$3.77	MAC				
141045	Caremark	Soo's	4/7/2021	\$60.97	MAC				
141048	Express Scripts	Cate Pharmacy	4/7/2021	\$92.96	MAC				
141050	Caremark	Medishop	4/7/2021	\$10.42	MAC				
141124	Optum	McCoy-Tygart	4/7/2021	\$516.66	12-MAC			10-NADAC	
140989	Caremark	Wynn	4/7/2021	\$127.37	MAC				
141122	Magellan	McCoy-Tygart	4/9/2021	\$23.69	MAC				
141129	Medimpact	McCoy-Tygart	4/9/2021	\$15.96	MAC				
140990	Ingenio	Wynn	4/9/2021	\$8.43	MAC				
141158	Optum	Medishop	4/12/2021	\$8.17	MAC				
141126	Caremark	McCoy-Tygart	4/12/2021	\$344.43	MAC				
141327	Optum	Medishop	4/13/2021	\$1.13	MAC				
141156	Caremark	Burrows Drug	4/13/2021	\$35.92	MAC				
141329	Caremark	Medishop	4/13/2021	\$1.41	MAC				
141314	Caremark	Burrows Drug	4/16/2021	\$274.09	MAC				
141315	Caremark	Burrows Drug	4/16/2021	\$199.07	MAC				
141366	Optum	Medishop	4/16/2021	\$4.53	MAC				
140949	Express Scripts	Parker Road Pharm	4/21/2021	\$325.91	MAC				
141328	Express Scripts	Medishop	4/22/2021	\$1.72	MAC				
141406	Optum	Soo's	4/22/2021	\$4.77	MAC				
141407	Caremark	Soo's	4/26/2021	\$162.18	MAC				
141460	Caremark	Medishop	4/26/2021	\$1.83	MAC				
141365	Express Scripts	Soo's	4/27/2021	\$18.34	MAC				
141461	Caremark	Medishop	4/27/2021	\$1.42	MAC				
141464	Caremark	Medishop	4/27/2021	\$2.22	MAC				
141123	Express Scripts	McCoy-Tygart	4/28/2021	\$2,549.56	MAC				
141515	IngenioRX	Wynn	4/28/2021	\$4.50	MAC				
141408	Caremark	McCoy-Tygart	4/28/2021	\$188.91	MAC				
141517	Caremark	Wynn	4/28/2021	\$33.96	MAC				
141405	Express Scripts	McCoy-Tygart	4/29/2021	\$1,304.75	MAC				
			Total	\$6,402.96					

MAY							\$15,644.76	
141584	Caremark	Medishop	5/3/2021	\$1.09	MAC			
141514	Optum	Wynn	5/3/2021	\$0.51	MAC			
141585	Optum	Soo	5/5/2021	\$0.55	MAC			
141510	Optum	Soo	5/5/2021	\$2.65	MAC			
141511	Express	Parker Road Pharm	5/5/2021	\$112.76	MAC			
141509	Express	Soo	5/5/2021	\$188.04	MAC			
141660	Express	Cate	5/7/2021	\$104.22	MAC			
141462	Optum	McCoy Tygart	5/7/2021	\$304.48	MAC			
141586	Caremark	Soo	5/12/2021	\$27.78	MAC			
141548	Caremark	Parker Road Pharm	5/12/2021	\$245.58	MAC			
141727	Optum	Cate	5/13/2021	\$108.84	MAC			
141711	Caremark	Soo	5/13/2021	\$179.33	MAC			
141720	Express	Soo	5/13/2021	\$18.04	MAC			
141728	Optum	Parker Road Pharm	5/14/2021	\$267.20	MAC			
141733	Caremark	Burrows	5/25/2021	\$225.73	MAC			
141736	Caremark	Medishop	5/25/2025	\$33.75	MAC			
141863	Optum	Parker Road Pharm	5/25/2021	\$143.69	MAC			
141866	Caremark	Soo	5/25/2021	\$14.54	MAC			
141932	Caremark	Burrows RX	5/25/2021	\$108.96	MAC			
141854	Express	Soo	5/26/2021	\$380.86	MAC			
141848	Optum	Soo	5/26/2021	\$64.52	MAC			
141865	Optum	Soo	5/27/2021	\$43.92	MAC			
141907	Optum	Parker Road Pharm	5/27/2021	\$267.32	MAC			
141871	Express	Soo	5/27/2021	\$8.31	MAC			
141861	Express	Soo	5/27/2021	\$45.17	MAC			
141944	Express	Soo	5/28/2021	\$18.34	MAC			
				\$2,916.18	MAC			
							\$18,560.94	

JUNE	MediImpact	Soo	6/1/2021	\$0.79	MAC
141933	Optum	Parker Road Pharmacy	6/4/2021	\$227.15	MAC
142140	Express Scripts	Clinton Drug	6/8/2021	\$23.89	MAC
142091	Caremark	Wynne	6/8/2021	\$21.67	MAC
142093	Caremark	Camp's	6/8/2021	\$21.66	MAC
142098	Caremark	McCoy Tygart	6/8/2021	\$410.08	MAC
142096	Caremark	Medishop	6/8/2021	\$0.87	MAC
142090	Ingenio	Wynne	6/8/2021	\$0.15	MAC
142097	Express Scripts	Clinton Drug	6/9/2021	\$20.36	MAC
142092	Express Scripts	Medishop	6/9/2021	\$1.97	MAC
142095	Express Scripts	Sheridan Family Pharmacy	6/9/2021	\$103.58	MAC
142141	Optum	Parker Road Pharmacy	6/9/2021	\$21.99	MAC
142168	Optum	Wynne	6/9/2021	\$24.40	MAC
142127	Optum	Soo's	6/9/2021	\$26.30	MAC
142142	Optum	Parker Road Pharmacy	6/9/2021	\$30.92	MAC
142129	Caremark	Soo's	6/9/2021	\$185.46	MAC
142132	Caremark	Burrows	6/9/2021	\$27.42	MAC
142135	Caremark	McCoy Tygart	6/9/2021	\$170.06	MAC
142169	Caremark	Wynne	6/9/2021	\$35.46	MAC
142197	Caremark	Soo	6/9/2021	\$171.44	MAC
142138	Magellan	Soo	6/9/2021	\$48.44	MAC
142115	Optum	McCoy Tygart	6/9/2021	\$663.96	MAC
141852	Express	Soo	6/9/2021	\$259.44	MAC
142136	Optum	McCoy Tygart	6/10/2021	\$158.59	MAC
142130	Optum	Soo	6/10/2021	\$9.05	MAC
142131	Optum	Sheridan Family Pharmacy	6/10/2021	\$215.32	MAC
142215	Optum	Parker Road Pharmacy	6/10/2021	\$155.64	MAC
142125	Express Scripts	McCoy Tygart	6/10/2021	\$488.80	MAC
142139	Express Scripts	Parker Road Pharmacy	6/10/2021	\$285.71	MAC
142143	Express Scripts	Clinton Drug	6/10/2021	\$2.01	MAC
142236	Optum	American	6/14/2021	\$35.25	MAC
142163	Optum	Wynne	6/16/2021	\$40.48	MAC
142213	Caremark	Parker Road Pharmacy	6/16/2021	\$91.55	MAC
142137	Optum	Clinton Drug	6/16/2021	\$8.04	MAC
142274	Express	Sheridan Family Pharmacy	6/16/2021	\$26.62	MAC
142133	Express	McCoy Tygart	6/17/2021	\$3,370.60	MAC
142243	Caremark	Wynne	6/17/2021	\$5.86	MAC
142234	Caremark	Burrows	6/17/2021	\$4.71	MAC
137568	Optum	several PSAO's	6/17/2021	\$1,044,220.00	Clawbacks
142264	Caremark	McCoy Tygart	6/18/2021	\$93.11	MAC
142275	Caremark	McCoy Tygart	6/18/2021	\$162.97	MAC
142215	Express	Parker Road	6/18/2021	\$170.21	MAC
142265	Optum	McCoy Tygart	6/18/2021	\$93.11	MAC
142279	Optum	McCoy Tygart	6/21/2021	\$221.65	MAC
142405	Express	Medishop	6/21/2021	\$0.53	MAC
142281	Express Scripts	McCoy Tygart	6/21/2021	\$176.29	MAC
142316	Optum	Parker Road Pharm	6/21/2021	\$29.72	MAC
142404	Express	Soo	6/21/2021	\$92.45	MAC
142312	Caremark	McCoy Tygart	6/21/2021	\$57.68	MAC
142346	Optum	Clinton Drug	6/21/2021	\$55.60	MAC
142371	Optum	Medishop	6/21/2021	\$5.96	MAC
128967	Optum	Camps	6/22/2021	\$58.59	MAC
142089	Magellan	Wynne	6/22/2021	\$5.62	MAC
142164	Magellan	Wynne	6/22/2021	\$11.24	MAC



142315	Caremark	Burrows	6/22/2021	\$53.29	MAC			
142324	Caremark	Medishop	6/22/2021	\$0.56	MAC			
142399	Caremark	Soo's	6/22/2021	\$12.88	MAC			
142363	Caremark	Soo's	6/22/2021	\$56.26	MAC			
142314	MedImpact	McCoy Tygart	6/22/2021	\$200.38	MAC			
128291	Optum	Hyde Park	6/16/2021	\$108.91	MAC	old file		
128967	Optum	Camps	6/21/2021	\$58.59	MAC	old file		
135438	Express	Camps	6/23/2021	\$101.08	MAC	old file		
142408	Express	McCoy Tygart	6/23/2021	\$310.67	MAC			
142409	Express	Sheridan Family Pharmacy	6/23/2021	\$71.86	MAC		\$1,053,823.50	
142456	Caremark	Burrows	6/24/2021	\$50.67	MAC			
127462	Optum	Caremark	6/24/2021	\$201.06	MAC	old file		
127002	Caremark	Hearland	6/24/2021	\$854.57	MAC	old file		
127458	Caremark	Wynne	6/24/2021	\$0.54	MAC	old file		
127625	Caremark	Wynne	6/24/2021	\$5.03	MAC	old file		
127623	Caremark	wynne	6/24/2021	\$2.95	MAC	old file		
128463	Caremark	Wynne	6/24/2021	\$0.77	MAC	old file		
128766	Caremark	Wynne	6/24/2021	\$0.98	MAC	old file		
128379	Optum	Camps	6/25/2021	\$71.70	MAC	old file		
129152	Caremark	Camps	6/25/2021	\$90.93	MAC	old file		
129210	Caremark	Cornerstone	6/25/2021	\$46.77	MAC	old file		
129211	Caremark	Cornerstone	6/25/2021	\$0.30	MAC	old file		
129277	Caremark	Deans	6/25/2021	\$13.77	MAC	old file		
129278	Caremark	Deans	6/25/2021	\$3.38	MAC	old file		
129741	Caremark	Camps	6/25/2021	\$4.15	MAC	old file		
130311	Caremark	Camps	6/25/2021	\$75.45	MAC	old file		
130356	Caremark	Camps	6/25/2021	\$34.42	MAC	old file		
131109	Caremark	Camps	6/25/2021	\$0.73	MAC	old file		
135550	Caremark	Camps	6/25/2021	\$1.66	MAC	old file		
133830	Caremark	Kavanaugh	6/25/2021	\$15.30	MAC	old file		
142504	Optum	Medishop	6/25/2021	\$10.93	MAC		\$1,055,308.60	
142280	Express	McCoy Tygart	6/28/2021	\$769.46	MAC			
142407	Express	McCoy Tygart	6/29/2021	\$1,563.84	MAC			
127849	Optum	Kavanaugh	6/28/2021	\$43.99	MAC	old file		
142400	Express	Soo's	6/29/2021	\$2.67	MAC			
142401	Optum	Soo's	6/29/2021	\$308.41	MAC			\$1,058,355.05
142402	Optum	Soo's	6/29/2021	\$37.50	MAC			\$18,560.94
128674	Optum	Heartland Pharmacy	6/29/2021	\$316.63	MAC	old file		\$1,076,915.99
142460	Optum	Medishop	6/29/2021	\$1.59	MAC		\$10,583,148.80	
				\$1,058,355.05				
				\$50,000.00	Fine			





143334	Optum	Wynne Apothecary	8/24/2021	\$15.93	MAC				
143169	Optum	Parker Road Speciality	8/24/2021	\$29.91	MAC				
143167	Optum	Parker Road Speciality	8/24/2021	\$34.01	MAC				
143118	Optum	Parker Road Speciality	8/25/2021	\$124.87	MAC				
143191	Optum	Soo's	8/25/2021	\$16.92	MAC				
143192	Optum	Soo's	8/25/2021	\$4.35	MAC				
143230	Express Scripts	Clinton	8/25/2021	\$12.90	MAC				
143232	Express Scripts	Clinton	8/25/2021	\$2.09	MAC				
143196	Optum	Soo's	8/25/2021	\$0.95	MAC				
143193	Optum	Soo's	8/25/2021	\$0.03	MAC				
143183	Optum	Parker Road Speciality	8/25/2021	\$0.71	MAC				
143472	Optum	Soo's	8/27/2021	\$17.92	MAC				
143550	Optum	Parker Road Speciality	8/27/2021	\$84.12	MAC				
143074	Optum	Wynne Apothecary	8/27/2021	\$3.08	MAC				
143552	Optum	Parker Road Speciality	8/27/2021	\$13.24	MAC				
143538	Caremark	McCoy Tygart	8/27/2021	\$61.06	MAC				
143476	Caremark	Soo's	8/27/2021	\$8.15	MAC				
143184	Optum	Parker Road Speciality	8/27/2021	\$40.18	MAC				
143432	Caremark	McCoy Tygart	8/27/2021	\$105.55	MAC				
143479	Express Scripts	Soo's	8/27/2021	\$5.98	MAC				
143516	Caremark	Clinton	8/30/2021	\$9.70	MAC				
143521	Caremark	Clinton	8/30/2021	\$4.13	MAC				
143546	Caremark	Parker Road Speciality	8/30/2021	\$112.47	MAC				
143547	Caremark	Parker Road Speciality	8/30/2021	\$23.39	MAC				
143666	Magellan	McCoy Tygart	8/30/2021	\$27.42	MAC				
143362	Caremark	McCoy Tygart	8/30/2021	\$97.48	MAC				
143761	Caremark	Medi Shop	8/30/2021	\$4.17	MAC				
143548	Caremark	Parker Road Speciality	8/30/2021	\$17.54	MAC				
143483	MedImpact	Sheridan Family	8/31/2021	\$110.25	MAC				
143660	Caremark	Soo's	8/31/2021	\$9.10	MAC				
143662	Caremark	Soo's	8/31/2021	\$11.98	MAC				
143654	Caremark	Wynne Apothecary	8/31/2021	\$6.40	MAC				
14357	Caremark	Wynne Apothecary	8/31/2021	\$6.40	MAC				
143502	Express Scripts	Medi Shop	8/31/2021	\$1.31	MAC				
143503	Express Scripts	Medi Shop	8/31/2021	\$35.44	MAC				
143504	Express Scripts	Medi Shop	8/31/2021	\$39.98	MAC				
143505	Express Scripts	Medi Shop	8/31/2021	\$1.29	MAC				
143501	Express Scripts	Medi Shop	8/31/2021	\$0.87	MAC				
143558	Caremark	Sheridan Family	8/31/2021	\$5.19	MAC				
143526	Express Scripts	Clinton	8/31/2021	\$6.86	MAC				
143527	Express Scripts	Clinton	8/31/2021	\$1.04	MAC				
143528	Express Scripts	Clinton	8/31/2021	\$16.66	MAC				
143529	Express Scripts	Clinton	8/31/2021	\$37.56	MAC				
143530	Express Scripts	Clinton	8/31/2021	\$11.91	MAC				
143531	Express Scripts	Clinton	8/31/2021	\$3.98	MAC				
143369	MedImpact	Sheridan Family	8/31/2021	\$14.92	MAC				
143618	Optum	Wynne Apothecary	8/31/2021	\$8.28	MAC				
143619	Optum	Wynne Apothecary	8/31/2021	\$7.69	MAC				
143620	Optum	Wynne Apothecary	8/31/2021	\$15.93	MAC				