

EXHIBIT D-2



August 8, 2017

Dear Public Health-House Health Services Subcommittee c/o Rep. Justin Boyd,

RE: ISP 2017-079

I am writing on behalf of the Arkansas Immunization Action Coalition (AIAC). The AIAC represents health care professionals, state agencies, local and national provider organizations, vaccine manufacturers, consumer groups and other organizations. The mission of the AIAC is to serve as a catalyst to promote individual and public health for all Arkansans through immunizations. Arkansas immunization rates remain ranked poorly compared to national immunization rates. This is partly due to access – there are 20 counties in Arkansas where the local health unit is the only Vaccines For Children provider. This means Medicaid children will see their primary care physician for well child visits and wait up to two months to get required immunizations.

Many of the items in this ISP came from immunization access barriers the Arkansas Immunization Action Coalition has been working to address – the biggest being the cost associated with providing immunizations. The acquisition cost of the vaccine isn't the only cost (VFC vaccine there is no acquisition cost) – the storage requirements for vaccine storage is expensive - recording refrigeration/freezer temperatures required by the CDC, documentation of immunizations, supplies to administer immunizations, personnel time, etc.

I ask that you consider examining the current immunization reimbursement regarding the cost of providing vaccines. My hope is this hearing is only the beginning of the immunization reimbursement conversation and not the end. After this hearing, go back to your local pediatrician or family practice physician and ask them what barriers they have regarding immunizations.

Respectfully Yours,

A handwritten signature in black ink that reads "Heather Mercer".

Heather Mercer

Executive Director

Arkansas Immunization Action Coalition

Human Services Subcommittee of Public Health, Welfare, and Labor
c/o State Representative Justin Boyd

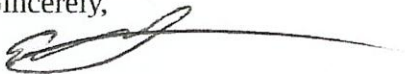
Dear Public Health Committee,

I am a pharmacist in Helena, Arkansas, who would like to appeal to the Public Health Committee to enable pharmacists to administer flu shots to Medicaid patients in our area over the age of 7. It has never made sense to me that Medicaid only reimburses us for patients over the age of 18. As most of you are aware, the pharmacist is the most accessible health care provider and one who welcomes the opportunity to take care of all patients over the age of 7. The physicians in town welcome the idea of letting the pharmacists administer flu shots for preventative care instead of waiting in a physician's office with other sick patients. Our physicians send us patients for immunizations in order to free up their busy schedules to take care of the immediate needs of their patients.

In addition to allowing us to get reimbursed for the Medicaid patients over 7 years old, we are appealing the reimbursement rate for such administration from Medicaid. Last year we were only paid \$12.06 for the administration of a flu shot to a Medicaid patient over the age of 18. This \$12.06 barely covered the cost of the flu shot vaccine and did not include any sort of administration fee. As a result, we ultimately lost money on each Medicaid flu shot we administered. As a reference, Medicare reimbursed the pharmacist \$37.80 for the flu vaccine and administration last year.

In our small community, pharmacists definitely have a huge impact on the preventative care and wellness of our patients. We work closely with physicians and other healthcare providers to give optimal care for our patients. We would like the opportunity to take care of all of our patients, including Medicaid recipients who are over the age of 7, by administering the flu vaccine. Thank you for your time and consideration. We can definitely make a financial impact/savings by vaccinating more patients for the flu.

Sincerely,



Ed Pat Wright, Pharm.D.



Arkansas State Board of Pharmacy

Published to promote compliance of pharmacy and drug law

101 E Capitol, Suite 218 • Little Rock, AR 72201 • Tel: 501/682-0190 • Fax: 501/682-0195

New Board Members

Stephanie O'Neal

Governor Mike Beebe appointed Stephanie Goodart O'Neal to the Arkansas State Board of Pharmacy on August 30, 2011.

Stephanie graduated from Wynne High School and attended the University of Arkansas, Fayetteville and Arkansas State University, Jonesboro. She graduated from the University of Arkansas for Medical Sciences College of Pharmacy in 1974.

Stephanie was employed as a staff pharmacist from 1974-1997. From 1997 to present she has held the positions of CEO and manager of Wynne Medical Pharmacy.

Professional memberships include the Arkansas Pharmacists Association, American Pharmacists Association, National Community Pharmacists Association, and International Academy of Compounding Pharmacists.

Stephanie is married and has one son, two stepchildren, and two grandchildren. She has served on the Cross County Arts Council and Cross County Chamber of Commerce Board of Directors. She is a member of First United Methodist Church in Wynne, AR, where she is currently a member of the Administrative Council and a member of the Finance Committee. She has also served on the Staff Parish Relations Committee.

Joyce Palla

Joyce Palla was appointed to the Arkansas State Board of Pharmacy by Governor Mike Beebe in September 2011. Joyce is a retired Cost Center manager from Texas Instrument and former owner of Palla-Warner Gifts and Antiques in Arkadelphia, AR.

Joyce is a board member of the Clark County Economic Development Corporation and Tourism Bureau, Arkadelphia Children's Advocacy Center, and a Clark County election commissioner. She also co-chairs the Arkadelphia 2025 Commission, serves as president of the Clark County Extension Homemakers, and is vice president of the Clark County Women Democrats.

Joyce is a member of the Arkadelphia Rotary Club, Arkadelphia Primrose Garden Club, Governor's Mansion Association, and the Clark County Master Gardeners.

Immunization Requirements

The Board would like to review language that was included in Act 147 of 2011 entitled, "AN ACT TO CLARIFY THE AUTHORITY OF PHARMACISTS TO PROVIDE VACCINES AND IMMUNIZATIONS AND TO ADMINISTER CERTAIN MEDICATIONS; AND FOR OTHER PURPOSES." In this act, changes were made to specific language to define the criteria for what type of orders or authority protocols must be in place for individual medications that may be administered by a pharmacist. The current statute reads:

Arkansas Code §17-92-101 (16)

(A) "Practice of pharmacy" means the learned profession of:

(i) (a) Dispensing, selling, distributing, transferring possession of, vending, bartering, or, in accordance with regulations adopted by the Arkansas State Board of Pharmacy, administering drugs, medicines, poisons, or chemicals that under the laws of the United States or the State of Arkansas may be sold or dispensed only on the prescription and order of a practitioner authorized by law to prescribe drugs, medicines, poisons, or chemicals.

(b) Except in accordance with regulations adopted by the Arkansas State Board of Pharmacy as recommended by the Medications Administration Advisory Committee, the administration of medications shall be limited to the following classifications of medications: immunizations, vaccines, allergy medications, vitamins, minerals, antihyperglycemics, and anti-nausea medications.

(c) Influenza vaccines and influenza immunizations may be administered to a person seven (7) years of age and older under a general written protocol.

(d) Vaccines and immunizations other than influenza vaccines and influenza immunizations may be administered to a person from seven (7) years of age to eighteen (18) years of age under a patient-specific order or prescription and subject to reporting of the administration to the prescribing physician together with any reporting required under § 20-15-1203.

(e) Vaccines and immunizations other than influenza vaccines and influenza immunizations may be administered to a person eighteen (18) years of age or older under a general written protocol.

(f) Medications other than vaccines and immunizations may be administered to a person seven (7) years of age or older under a patient-specific order or prescription and subject to reporting of the administration to the prescribing physician.

(g) A general written protocol under subdivisions (16)(A)(i)(c) and (e) of this section and patient-specific orders or prescriptions under subdivisions (16)(A)(i)(d) and (f) shall be from a physician licensed by the Arkansas State Medical Board and practicing in Arkansas or within fifty (50) miles of the Arkansas border;

?
Age
→

ACT 284

- Erases the limited list of medications that a pharmacist can administer and instead points to the Board of Pharmacy to make rules on any limits. Previous language limited pharmacists to administering immunizations, vaccines, allergy medications, vitamins, minerals, antihyperglycemics, and antinausea medications.
- Added language to allow pharmacists to initiate therapy and administer or dispense or both Naloxone pursuant to a statewide protocol.
- Allows physicians to dispense Naloxone or contraceptives without a dispensing permit.