



January 27, 2022

Mr. Jake Bleed

Director of Employee Benefits Division
Arkansas Department of Transformation and Shared Services
501 Woodlane, Suite 201
Little Rock, AR 72201

Dear Director Bleed,

The Arkansas Pharmacists Association would like to strongly encourage the Arkansas Employee Benefits Division and the State Board of Finance to immediately add an enhanced dispensing fee for Arkansas community pharmacies in the range of \$20 to \$40 for handling and dispensing molnupiravir and Paxlovid (nirmatrelvir co-packaged with ritonavir). We would also respectfully request that the enhanced dispensing fees be implemented with a retroactive date of January 1, 2022. This action would ensure that our pharmacists are incentivized to provide these life-saving medications leading to better access, safer utilization, and better coordination with prescribers to prevent hospitalizations and death for employees and family members covered in the Employee Benefits Division health plan.

These prescription medications were newly authorized under an emergency use authorization (EUA) by the Food & Drug Administration (FDA) in December of 2021. These prescription drugs, Pfizer's Paxlovid and Merck's molnupiravir, are oral therapeutics designed to slow disease progression and lessen the odds of hospitalization or death from COVID-19. They have been shown to reduce hospitalizations and deaths from 30-90% and will save millions of dollars in unnecessary spending. Of note, the average hospitalization costs from uncomplicated COVID-19 hospital admissions range from \$20,000 to \$50,000 per stay with complicated hospitalization visits costing well north of \$100,000.

The Arkansas Department of Health has partnered with Arkansas pharmacies and issued best practice requirements to ensure that access to therapeutics in rural areas and areas with high social vulnerability is maintained. These requirements call upon pharmacies throughout Arkansas to remain open or on call 7 days a week. It is also imperative that these antiviral treatments be started within 5 days of onset of symptoms, so every hour or day that access to these treatments are delayed can increase the likelihood that these therapies will not work or even worsen outcomes if started too late. Testing delays and inadequate supply of home tests also adds to the burden of making sure these COVID-19 antiviral treatments are started as soon as possible. Arkansas pharmacists are the most accessible healthcare providers in both urban and the many rural areas of the state, making adequate reimbursement to provide these time-sensitive treatments of utmost importance.

The National Community Pharmacists Association (NCPA) has recently recommended (January 18, 2022) to the Centers for Medicare and Medicaid Services (CMS) that the enhanced dispensing fee paid to community pharmacists should be \$40. We agree with the NCPA study and recommendation.



Pharmacists who have been allocated product and are actively dispensing these prescriptions must perform additional tasks involved with dispensing oral COVID-19 antivirals that would not be considered part of the usual dispensing process. Between **30 to 45 minutes** of extra time is warranted to properly dispense these treatments and the extra steps include non-standard ordering and receipt of the physical product, on-boarding new patients, checking for drug-drug interaction screening, participating in the prescriber decision-making process (working with prescribers to prioritize limited available doses, accurate date on e-prescriptions, transitioning patients from monoclonal antibodies to oral therapy), enhanced patient counseling and monitoring, and scheduling delivery to minimize exposure to confirmed positive COVID-19 cases. In many cases, the overall dispensing process could exceed an hour for new or established patients.

The pharmacists of Arkansas seek your immediate assistance to ensure that patients across our great state have reliable, timely, and ready access to these COVID-19 oral antivirals at their local pharmacies. APA is extremely concerned that the recent lack of clear federal guidance on proper and fair compensation to community pharmacists will keep these life-saving medications out of the hands of many patients and we need the leadership and immediate assistance of EBD to ensure that Arkansas will remain at the front lines and cutting edge of providing the proper care for Arkansans, especially during the COVID-19 pandemic. We appreciate your ongoing support and look forward to working with you continuously for the betterment of the people of Arkansas.

Thank you for your attention and consideration

A handwritten signature in blue ink that reads "John A. Vinson".

John A. Vinson, PharmD
Arkansas Pharmacists Association, CEO