

March 17, 2020

The Honorable Mike Pence  
Vice President  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, DC 20501

RE: Community Pharmacists' Recommendations to the President's Coronavirus Task Force

Dear Vice President Pence:

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. Our members stand ready to assist the President's Coronavirus Task Force 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 suspension 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 the Administration to implement the policies contained in the attachment 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 me at 703-838-2648 or [doug.hoey@ncpa.org](mailto:doug.hoey@ncpa.org), or my colleague Ronna Hauser, vice president of policy, at 703-838-2691 or [ronna.hauser@ncpa.org](mailto:ronna.hauser@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 Ambassador Dr. Debbie Birx, White House Coronavirus Response Coordinator  
The Honorable Alex Azar, Secretary, HHS  
Dr. Robert Kadlec, Assistant Secretary for Preparedness and Response, HHS  
The Honorable Seema Verma, Administrator, CMS  
The Honorable Robert Wilkie, Secretary, Department of Veterans Affairs  
The Honorable Dr. Ben Carson, Secretary, Department of Housing and Urban Development  
The Honorable Dr. Stephen Hahn, Commissioner, Food and Drug Administration  
VADM Dr. Jerome M. Adams, U.S. Surgeon General  
Kelvin K. Droegemeier, Director, White House Office of Science and Technology Policy  
Robert O'Brien, Assistant to the President for National Security Affairs  
Dr. Robert Redfield, Director, CDC  
Dr. Anthony Fauci, Director, The National Institute of Allergy and Infectious Diseases at the National Institutes of Health  
Deputy Secretary Stephen Biegun, Department of State  
Ken Cuccinelli, Acting Deputy Secretary, Department of Homeland Security  
Joel Szabat, Acting Under Secretary for Policy, Department of Transportation  
Matthew Pottinger, Assistant to the President and Deputy National Security Advisor  
Rob Blair, Assistant to the President and Senior Advisor to the Chief of Staff  
Joseph Grogan, Assistant to the President and Director of the Domestic Policy Council  
Christopher Liddell, Assistant to the President and Deputy Chief of Staff for Policy Coordination  
Derek Kan, Executive Associate Director, Office of Management and Budget  
Larry Kudlow, Assistant to the President for Economic Policy and Director for National Economic Council  
Dr. Anita Patel, Senior Advisor, Pandemic Preparedness and Response, CDC  
Mark Meadows, Chief of Staff, The White House

## **Community Pharmacists' Recommendations to the Administration 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. Independent community pharmacies can scale quickly, are flexible, and are extremely adaptable in both urban and rural communities.

**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](#), as availability of tests and versatility of available tests develop.
- [Testing site access for COVID-19](#).
- [Provide home delivery services](#) to allow patients to stay at home. Many pharmacies also have drive-thru windows.
- [Compound hand sanitizer](#). Per recently released [FDA guidance](#) on compounding alcohol-based hand sanitizer, thousands of local pharmacies are capable of making product available in their respective communities.
- [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 pharmacist point-of-care 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:**

- [Suspend all pharmacy direct and indirect remuneration \(DIR\) fees](#) assessed on pharmacies immediately.
- [Make tests for COVID-19 and protective equipment](#) available to small business pharmacies to test staff/patients.
- [Waive all requirements for patient signature](#) or other delivery verification requirements.
- [Allow pharmacists to compound commercially available prescriptions](#) if there are drug shortages.
- [Allow pharmacists to dispense early refills and emergency refills](#) for maintenance medications.
- [Instruct PBMs to allow 90-day prescription refills at any network pharmacy with commensurate reimbursement](#).
- [Authorize pharmacists to conduct therapeutic interchange](#) without physician authorization if drug shortages exist.
- [Allow pharmacists to deliver](#) any medication to patients' homes.

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