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NACDS

NATIONAL ASSOCIATION OF
CHAIN DRUG STORES

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Submitted via Email

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June 3, 2013

Cynthia K. Montgomery
Regulatory Counsel
Department of State
Bureau of Professional and Occupational Affairs
State Board of Pharmacy
P.O. Box 2649
Harrisburg, PA 17105-2649

RE: Collaborative Management of Drug Therapy

Dear Ms. Montgomery:

On behalf of the chain pharmacies operating in the state of Pennsylvania, the National Association of Chain Drug Stores (NACDS) and the Pennsylvania Association of Chain Drug Stores (PACDS) write to express our support of the proposed rules that would allow community pharmacists to enter into collaborative practice agreements with licensed physicians.

We jointly represent traditional drug stores, supermarkets, and mass merchants with pharmacies - from regional chains with four stores to national companies. Chains operate more than 40,000 pharmacies and employ more than 3.5 million employees, including 130,000 pharmacists. They fill over 2.6 billion prescriptions annually, which is more than 72 percent of annual prescriptions in the United States. In Pennsylvania, there are about 2,852 pharmacies, of which 1,957 are chain pharmacies. Those chain companies employ approximately 144,772 Pennsylvania residents, including 6,387 pharmacists, and pay about \$950 million in taxes to the state annually. As a group, Pennsylvania chain and independent pharmacies employ about 149,986 full- and part-time workers, including about 2,852 pharmacists, paying about \$980 million in state taxes annually.

Over the last decade, the patient care services provided by community pharmacists throughout the country have gained widespread public attention for achieving improved outcomes in patients with chronic healthcare issues, while at the same time reducing overall healthcare costs. Collaborative practice agreements can improve patient care by increasing opportunities for pharmacists to contribute their specialized expertise to a patient's drug therapy. By permitting pharmacists in Pennsylvania to enter into

collaborative practice agreements with physicians to provide additional disease management services, patients may further benefit from the pharmacist's clinical skills and result in improved patient outcomes.

Community pharmacies are the face of neighborhood healthcare. The innovative programs of chain pharmacies deliver unsurpassed value - improving health and wellness and reducing healthcare costs. Through face-to-face counseling, the pharmacist-patient relationship helps people take medications correctly. This improved medication adherence means a higher quality of life, and the prevention of costly treatments. Innovative community pharmacy services - vaccinations, health education, screenings, disease management and more - also make up the healthcare delivery system of tomorrow.

Community pharmacists are highly educated to assist patients in managing their drug therapy and they are one of the most accessible healthcare providers. Pharmacists are knowledgeable professionals that play a critical role in the healthcare delivery system. As highly educated medication use experts, pharmacists are well-positioned to work collaboratively with physicians to provide education and guidance for patients on the appropriate use of their medications and to offer a range of patient-oriented services to maximize a medication's effectiveness.

By virtue of their education, pharmacists are well trained to serve patients through a collaborative practice arrangement. The current structure of a pharmacy practice residency program requires a resident to first complete a general pharmacy residency. After completion, the resident has the option to complete an additional "specialty" pharmacy practice residency in areas such as internal medicine, oncology, etc. Considering the rigorous program criteria, we feel that no further education requirements are necessary.

Currently, thirty-six states enable community pharmacists and physicians to engage in collaborative practice agreements, allowing community pharmacists to provide services to help patients to better manage conditions such as diabetes, asthma, or high blood pressure and provide patient health care benefits. In these states, community retail pharmacists have proven to be valuable partners in ensuring safe, appropriate, and cost-effective medication use.

We thank you for the opportunity to provide comments, and we welcome the opportunity to discuss further or answer any questions that you may have.

Sincerely,



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