

March 30, 2021

Xavier Becerra
Secretary
U.S. Department of Health and Human Services
200 Independence Ave., S.W.
Washington, D.C. 20201

Dear Secretary Becerra,

On behalf of our members, we would like to congratulate you on your confirmation as the Secretary of United States Department of Health and Human Services (HHS). Collectively, our organizations represent America's 309,000 licensed, working pharmacists, as well as pharmacy technicians and student pharmacists. Our members are essential frontline workers, providing patient care in a variety of settings, including hospitals, clinics, health centers, community pharmacies, long-term care facilities, and physician offices.

Pharmacists are not only the medication experts on the healthcare team, they are also the nation's most accessible clinicians. Pharmacists now earn clinically-based Doctor of Pharmacy (Pharm.D.) degrees, and many complete postgraduate residencies and/or become board-certified in a variety of specialties. More than 90% of Americans live within five miles of a community pharmacy. Pharmacists provide direct patient care services, including immunizations, disease state and medication management, smoking cessation counseling, health and wellness screening, and other preventive services that reduce health inequities. During the pandemic, pharmacists continue to be critical to COVID-19 response, from testing to immunization and administration and monitoring of monoclonal antibody treatments to reduce the spread of the virus. In short, pharmacists are a linchpin of our nation's public health.

As you begin your work at HHS, our organizations stand ready to help. Our members share your agency's commitment to improving public health and are actively engaged in many of the most critical public health challenges our nation faces, from COVID-19 to the opioid crisis. To assist in your work, our organizations have highlighted our most pressing public health priorities and offered recommendations for addressing them:

- **Remove Barriers to Full Engagement of Pharmacists in Public Health:** During the pandemic, as highly trained clinicians, pharmacists have demonstrated the ability to significantly expand patient access to needed care and contribute to addressing/improving public health, especially in rural and underserved areas. However, outside of the pandemic, major barriers restrict pharmacists from fully utilizing their expertise, such as a lack of direct payment for services, including those necessary to fully support the COVID-19 response, the inability to provide medication-assisted treatment (MAT) for opioid use disorder, and the onerous requirements for states and pharmacies to participate in the Vaccines for Children program. We urge you to use HHS's regulatory authority to remove these barriers and take action to ensure that pharmacists are fully engaged in patient care.

- **Retain the Current Flexibilities Provided During the PHE:** During the COVID-19 public health emergency, to mitigate and prevent infections, HHS and its subagencies instituted several regulatory flexibilities for pharmacists and other clinicians. Many of these flexibilities, including test-treat-immunize and telehealth models, should be made permanent, as they have significantly increased patient access without compromising patient care. Given the financial and human resources dedicated to scaling up these service models coupled with their patient access benefits, retaining them is a commonsense approach to ensuring our healthcare system is ready for the next public health threat. In addition, payment for these services is imperative in Medicare, Medicaid, and other insurance models.
- **Ensure Medication Access and Affordability:** Prior to the pandemic, patients were facing a medication affordability crisis. Unfortunately, this will remain an issue after we defeat COVID-19. We urge HHS to consider solutions that are tailored to reduce both patient out-of-pocket cost and systemic costs, while protecting our supply chain and patient access to medications, services, and innovation.

Our members are on the front lines of the COVID-19 response and have been a lifeline for patients seeking testing, immunizations, and medications. They are also the leaders managing fragile drug supply chains on behalf of patients and the healthcare enterprise. Their voice and expertise should be included in HHS decisionmaking. We respectfully request the opportunity to meet with you to discuss the critical role pharmacists and pharmacy technicians play in meeting our shared public health goals.

Again, on behalf of the undersigned organizations, congratulations on your appointment as HHS Secretary. As your partners in public health, we look forward to working with you to strengthen our healthcare system and improve patient quality and outcomes.

Sincerely,

Academy of Managed Care Pharmacy
 American Association of Colleges of Pharmacy
 American College of Apothecaries
 American College of Clinical Pharmacy
 American Pharmacists Association
 Accreditation Council for Pharmacy Education
 American Society of Consultant Pharmacists
 American Society of Health-System Pharmacists
 College of Psychiatric and Neurologic Pharmacists
 Hematology/Oncology Pharmacy Association
 National Alliance of State Pharmacy Associations
 National Association of Specialty Pharmacists
 National Community Pharmacists Association
 National Pharmaceutical Association