

May 5, 2021

Commissioner Betty A. Rosa
New York State Commissioner of Education
New York State Education Building
89 Washington Avenue
Albany, NY 12234

Dear Commissioner Rosa,

First and foremost, we want to thank you and commend your leadership during these difficult times. We know that you are working hard to keep New Yorkers safe and healthy and extend tremendous gratitude to you for your hard work. In light of these circumstances, we respectfully want to bring to your attention an urgent public health matter for New Yorkers with serious mental illness (SMI) and substance use disorder (SUD). While this is not an entirely new issue for New Yorkers, it has been exacerbated by the pandemic. Prior to COVID, we were working to support legislation (A3040 / S4870) which authorizes pharmacists to administer long acting medications (LAIs), as is already being practiced in 43 other states, because of the tremendous benefit that it brings to this patient population. The pandemic has, unfortunately, highlighted some of the vulnerabilities in our system of care for people with SMI and SUD, thereby making the passage of this legislation even more crucial.

As we know, COVID-19 has exacerbated the already dire addiction and mental health crises. It has also intensified access issues for SUD and SMI treatment. Overdoses are surging as more people are using substances in isolation and in-person help is less available. Disruptions to treatment plans have increased the risk of relapse and overdose among patients. We seek urgent solutions to address this crisis and increase access to life-saving medications; one clear solution is to allow pharmacists to administer LAIs.

Allowing pharmacists to administer medication can provide numerous benefits including, but not limited to, “[i]ncreased access to care,” “[i]mproved adherence to therapy,” and “[i]ncreased quality of care and access to a knowledgeable provider.”¹ For those patients suffering from SUD, medication assisted treatment (MAT) is considered the gold standard in treating opioid use disorder (OUD)¹. MAT is medication to treat SUD coupled with comprehensive psychosocial treatment and is available in various forms, including as an LAI.

While telehealth removes significant treatment barriers for many patients, it has created a significant barrier to those who receive LAIs for SUD and SMI. During the pandemic, many providers have either suspended in-person visits, have limited office hours, or moved to telehealth, affecting the patient’s access to receiving their injectable medication. Due to the barriers created by the move to telehealth, alternative settings of care for those patients currently receiving LAIs, and for those who may be appropriate to begin LAIs, need to be created. Allowing pharmacists to administer these important medications would go a long way in resolving this substantial barrier to treatment.

In addition to mitigating the treatment barrier, allowing pharmacists to administer LAIs can help patients by expanding access to treatment. Meeting patients where they are is a critical element of successful recovery, especially in this unprecedented pandemic. Allowing pharmacists to administer LAIs greatly increases treatment points for patients, due to high accessibility of community pharmacies in comparison to treatment providers. Pharmacies can be much closer to a patient's home, which is incredibly important for those patients in underserved communities.

This legislation may also help patient adherence to therapy and continuity of care because the pharmacist is required to maintain communication with the patient's prescriber throughout the medication administration process, including when the medication is dispensed. The pharmacy is also able to put into place policies and procedures for communicating care delivery back to the patient's physician. The treatment challenge with oral forms of these medications is often non-adherence. Simply put, allowing pharmacists to administer LAIs can help patients access their medications and be engaged in care.

Another benefit of this legislation is helping to reduce the stigma for patients who are receiving treatment. Enabling patients to receive their LAIs for SUD and SMI in a community pharmacy setting rather than a provider's office that is specific to their disease may help reduce the stigma faced by patients because they are able to receive their medication at the pharmacy, just like they would for another disease.

We know, and studies illustrate, that pharmacists are a trusted provider of healthcare services with high rates of satisfaction for people in states who have received their injections from their pharmacist. Pharmacists are very well trained and knowledgeable, and are well positioned to fill this gap in the healthcare system on behalf of patients suffering from SMI and SUD.

We implore New York state to prioritize the ability for pharmacists to administer long-acting injectable medications for the care and well-being of patients with SUD or SMI. Thank you for your leadership during this crisis and for your consideration.

Respectfully,

National Alliance on Mental Illness – New York State

National Alliance on Mental Illness – New York City

Mental Health Association in New York State, Inc.

Fountain House

Pharmacists Society of the State of New York

Kinney Drugs

Damian Family Care Centers, Inc.

Legal Action Center

Adam Bisaga, M.D., Columbia University

Community Pharmacy Association of New York State

The Coalition for Behavioral Health

National Council for Behavioral Health

Shatterproof

Depression and Bipolar Support Alliance

The College of Psychiatric and Neurologic Pharmacists National Alliance of State Pharmacy Associations