



COLORADO
PHARMACISTS
SOCIETY

Colorado Pharmacists Society

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March 25, 2020

To: Kim Bimestefer
Executive Director
Colorado Department of Health Care Policy & Financing

CC: Tom Leahey
Interim Pharmacy Officer
Colorado Department of Health Care Policy & Financing

Deann Roecker, PharmD
Pharmacy Director
Colorado Department of Health Care Policy & Financing

Dear Director Bimestefer,

I am writing to you today on behalf of the Colorado Pharmacists Society (CPS) to request that you on behalf of the Colorado Department of Health Care Policy & Financing (HCPF) submit a waiver to CMS that would allow the state's Medicaid program to fully engage and empower pharmacists to provide care and services to patients during this COVID-19 outbreak.

As you are aware, President Trump declared that the COVID-19 outbreak constitutes a national emergency. In response to that declaration, the Centers for Medicare & Medicaid Services (CMS) has taken steps to remove red tape to allow states more flexibility in amending their Medicaid programs to provide appropriate benefits to respond to the COVID-19 outbreak. CMS has provided a template for states to request an 1135 waiver to amend their state Medicaid plans to increase enrollment and provide for additional benefits to battle the disease.

Pharmacists are essential providers and are serving on the front lines of this pandemic. Health First Colorado patients, including those who have tested positive for COVID-19 as well as those who have not, must have uninterrupted access to care and services in order to manage their acute and chronic conditions to ensure optimal health and prevent increased hospitalizations and unnecessary provider visits.

The Colorado Pharmacists Society respectfully requests that the Colorado Department of Health Care Policy & Financing consider including the following waiver recommendations:

Expand pharmacists as providers

CPS strongly urges HCPF to authorize pharmacists to be enrolled as providers of care and services to ensure that patients have uninterrupted access to care and services during this crisis. HCPF should empower and mobilize all qualified and highly trained medical professionals, including pharmacists, to help in this fight. As our health care system rapidly pivots its focus toward management of COVID-19 testing and treatment, CPS recommends that

HCPF include the following actions in its waiver to increase patient access to pharmacist-provided care and services:

- Authorize pharmacists to be enrolled as providers to deliver designated services to Health First Colorado patients and promote increased access to pharmacist-provided care and services pursuant to their scope of practice.
- In addition to prescribing selected OTC items, pharmacists should be able to prescribe contraceptives and smoking cessation therapies per approved statewide protocols.
- Authorize pharmacists to perform therapeutic substitution of medications within the same therapeutic class, without prescriber authorization, if disruptions in the pharmaceutical supply chain or prescription drug shortages should occur.

CPS applauds the swift action already taken by HCPF to change early refill tolerance for most medication to 50% previous fill, allow one-time early refill overrides, and removing restrictions on non-narcotic prescription cough and cold products, while also considering allowing deferment of prior authorizations, allowing 90-day supplies on certain non-maintenance medications and monitoring access to potential drug shortages.

However, CPS also encourages HCPF to consider the following additional actions via the 1135 waiver request:

Adjustments to the day supply or quantity limit for covered outpatient drugs

CPS recommends that HCPF allow a 90-day supply for all chronic maintenance medications. Authorizing pharmacists to dispense a 90-day supply of medications for patients will reduce patient visits to the pharmacy for maintenance medications.

Prior authorization for medications is expanded by automatic renewal without clinical review, or time/quantity extensions

CPS recommends that HCPF temporarily extend and/or suspend prior authorization requirements for medications to allow patients who are considered high-risk for worsening morbidity and mortality related to the COVID-19 virus, such as the elderly and immunocompromised, to ensure that patients have uninterrupted access to medication therapies.

Payment adjustment to the professional dispensing fee when additional costs are incurred by the providers for delivery

CPS recommends that HCPF take advantage of this opportunity to support pharmacies by encouraging patients to use home delivery services for prescription drugs. To control the spread of COVID-19, people must remain in their homes as much as possible. Pharmacies are prepared to assist those patients by delivering their medications straight to their door. To ensure pharmacies can continue providing these services for their vulnerable patients, the state must apply for an adjustment to the professional dispensing fee to account for the additional costs incurred by offering home delivery services.

Exceptions to published Preferred Drug List if drug shortages occur

CPS encourages HCPF to actively monitor the drug supply chain, routinely seek input from the pharmacy community, and swiftly make adjustments and exceptions to the preferred drug list, in order to mitigate actual or anticipated drug shortages.

Additional policy recommendations

CPS recommends that HCPF take action on the following recommendations in order to support pharmacists as we continue to serve patients as essential providers during this pandemic.

- Waive any requirement from HCPF, or its pharmacy benefits manager, for pharmacies to collect signatures upon delivery or “proof of delivery” from patients to prevent the spread of coronavirus through contamination of pens or electronic signature devices
- Suspend all routine or scheduled audits of pharmacies by HCPF, or its pharmacy benefits manager, until after the end of the emergency period, to allow pharmacists to focus solely on addressing the needs of patients.

Thank you for your time and consideration of these requests. If you have any questions about the recommendations above, please feel free to reach out to me.

Sincerely,



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