



July 10, 2020

[Submitted electronically to Rules@Medicaid.Ohio.gov and Noninstitutional_policy@medicaid.ohio.gov]

Maureen M. Corcoran
Director
Ohio Department of Medicaid (ODM)
50 West Town Street, Suite 400
Columbus, Ohio 43215

Re: Support for Comments Submitted by the Ohio Pharmacists Association to ODM: ERF 188094: Rules Regarding Services Provided by a Pharmacist Comment Period 6/29/2020 to 7/10/2020

Dear Director Corcoran:

On behalf of our 1,835 Ohio pharmacy practitioners and students, the American Pharmacists Association (“APhA”) is pleased to submit our strong support for the revisions submitted by the Ohio Pharmacists Association (“OPA”) to the proposed ODM rules regarding services provided by a pharmacist.

Founded in 1852, APhA represents our nation’s pharmacists, pharmaceutical scientists, student pharmacists, pharmacy technicians, and others interested in improving medication use and advancing patient care. APhA members provide care in all practice settings, including community pharmacies, hospitals, long-term care facilities, specialty pharmacies, community health centers, physician offices, ambulatory clinics, managed care organizations, hospice settings, and the uniformed services.

APhA appreciates your leadership in implementing Ohio State law (SB 265, 132nd General Assembly) to permit certain health insurers to provide payment or reimbursement for services lawfully provided by a pharmacist. However, the current draft of the proposed ODM rules would render the law ineffective for Medicaid pharmacy providers and beneficiaries. As a reference, OPA has forwarded to ODM a “Pharmacist Provided Patient Care Services” appendix, which clearly explains the variety of services that a pharmacist can provide, along with delineations of whether or not a physician protocol or consult agreement is required in order to offer that service. As OPA points out, under the draft rules many important pharmacist-provided patient care services that are invaluable to patients including asthma coaching, transitions of care, smoking cessation, disease state management, controlling substance abuse, and more would be left out. Clearly, the intention of SB 265 was to permit reimbursement payment for any service within the pharmacist’s scope of practice, as well as additional services that a pharmacist can render on behalf or via a physician, such as immunizations, long-acting injections, and services

performed under a consult agreement. SB 265 was not meant to limit pharmacist-provided patient care services to only those rendered through a physician relationship or that require a written order from a prescriber in order to receive reimbursement.

Pharmacists have the skills to improve transitions of care from site of health care to home, maximize drug therapy regimens, add value to the health care team, and actively manage diseases like diabetes and high blood pressure by monitoring patients and changing and adjusting their medications.

Governor Mike Dewine recognizes the vital role that pharmacists can play in enhancing public health. During our efforts to battle the COVID-19 pandemic, Governor Dewine has referenced pharmacists as critical “frontline health care providers,” and recently stated “I’m working aggressively with the Ohio Pharmacist Association.” “Pharmacies are an important part of our plan to fight COVID-19, especially as we look towards the future beyond testing and towards a vaccine.” We expect Governor Dewine’s ongoing leadership and strong partnership with OPA to continue to improve the quality of care for patients in Ohio.

Thank you for the opportunity to provide comments on the proposed ODM rules implementing SB 265. We look forward to your revisions to the proposed ODM rules to ensure pharmacists in Ohio can practice at the top of their scope. APhA believes with OPA’s recommended revisions, Ohio will continue to lead the nation in unleashing the power of pharmacists to “elevate the standard of care to Medicaid beneficiaries in Ohio.” If you have any questions or require additional information, please contact Michael Baxter, Senior Director, Regulatory Policy, at mbaxter@aphanet.org or by phone at (202) 459-8963.

Sincerely,



Ilisa BG Bernstein, PharmD, JD, FAPhA
Senior Vice President, Pharmacy Practice and Government Affairs

cc: The Honorable Governor Mike Dewine
The Honorable Senator Matt Dolan (Senate District 24)
Ernest Boyd, Executive Director, OPA
Antonio Ciaccia, Director of Government & Public Affairs, OPA