



Nov. 13, 2019

Ms. Sharon Henes, Administrative Rules Coordinator
Division of Policy Development
Department of Safety and Professional Services
PO Box 8366
Madison, WI 53708-8935
Via email: DSPSAdminRules@wisconsin.gov

Re: Economic Impact of Proposed Amendments to Phar 7.08 – Patient Consultations for New Prescriptions

Dear Ms. Henes:

I am writing to provide the Pharmaceutical Care Management Association (PCMA) statement on the Pharmacy Examining Board's proposed amendments to Chapter Phar 7, Pharmacy Practice, regarding oral consultations for new prescriptions (Phar 7.08). PCMA is the national trade association representing pharmacy benefit managers (PBMs), which manage prescription drug benefits for large employers, health insurance carriers, labor trusts, government programs, and other payers. Many PBMs also own and operate mail service pharmacies that serve Wisconsin residents. We appreciate the opportunity to provide an economic impact statement on the proposed amendments.

The Pharmacy Examining Board has issued proposed changes to its existing rule on the requirements for pharmacists to provide oral consultations to patients for new prescriptions. As we understand the rule, the Board's proposed changes would change the exception for mail service pharmacies and apply the requirements to all pharmacies. Up to this point, it has been longstanding policy that mail service pharmacies are exempted from oral consultation requirements (See 7.01(e): "The consultation requirement applies to original and renewal prescription orders and, *except when prescriptions are delivered to a location of the patient's choice*, is not satisfied by only offering to provide consultation" emphasis added). Removing this exception would have a significant impact on mail service pharmacies and would cause a significant waste of resources. In some cases, mail service pharmacies process millions of prescriptions every month, many of them new prescriptions. Mail service pharmacies make proactive calls to patients when pharmacists identify a need, provide written counseling materials to patients, and offer to counsel by telephone by providing access to health care professionals 24 hours a day, 7 days a week. It does not make economic sense for a mail service pharmacy to call every patient that has a new prescription when it is not needed, thereby potentially diverting resources from those patients who do have need. In addition, waiting to send a prescription before this conversation can happen will cause a delay in patients getting their medications sent to them.



PCMA surveyed its member companies with mail service pharmacies to assess the economic impact of this proposed rule change, including the downstream costs to purchasers of mail service pharmacy services. The companies that reported indicate that there would be an estimated 2-year financial impact within Wisconsin of close to \$30,000,000. These costs, ultimately, will be borne by the people who pay for health care services—employers, individuals, and taxpayers.

This policy change is not supported by evidence of a consumer safety issue necessitating the change and it will result in diverting resources that should be used for those patients in need. It is for these reasons that PCMA objects to this proposed rule change. Thank you for the opportunity to provide comment. Please contact me at 202-756-5743 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "April C. Alexander". The signature is fluid and cursive, with a long horizontal stroke at the end.

April C. Alexander
Vice President, State Legislative and Regulatory Affairs