

March 2, 2023

The Honorable Joseline Pena-Melnyk Chair, Health and Government Operations Committee 241 Taylor House Office Building 6 Bladen Street Annapolis, MD 21401

Re: Support for HB 382

Dear Chair Pena-Melnyk and Members of the Committee:

The National Community Pharmacists Association (NCPA) is writing to express its strong support for the Managed Medicaid pharmacy reimbursement floor proposed in HB 382. NCPA represents the interest of America's community pharmacists, including the owners of more than 19,400 independent community pharmacies across the United States and more than 330 independent community pharmacies in Maryland. These pharmacies employed more than 4,000 individuals and they filled nearly 21 million prescriptions in 2021, generating more than \$883 million in total sales.

Fee-for-service Medicaid programs reimbursement rates are transparent and both cost- and evidence-based. The Centers for Medicare and Medicaid Services requires Medicaid pharmacy programs reimburse the actual acquisition cost of drugs plus a professional dispensing fee determined by a cost of dispensing survey. We support HB 382's proposal to use the National Drug Average Acquisition Cost benchmark (NADAC), which is updated on a weekly basis. We also support the use of a professional dispensing fee from a recent cost of dispensing survey conducted by the Department of Health. NCPA encourages the State of Maryland to conduct regular cost of dispensing surveys to keep the professional dispensing fee updated and reflective of a pharmacy's cost to dispense.

Recognizing the value to taxpayers of requiring transparent reimbursements in their Medicaid managed care programs, Arkansas, Georgia, Iowa, Kansas, Kentucky, Louisiana, Michigan, Mississippi, North Carolina, and Ohio (dispensing fees vary based on volume) require MCOs and PBMs to reimburse pharmacies at the same rates established under the fee-for-service program. If such transparent reimbursement methodologies were adopted nationwide, federal Medicaid spending would drop by almost \$1 billion over 10 years.¹

1 https://www.finance.senate.gov/imo/media/doc/2020-03-13%20PDPRA-SFC%20CBO%20Table.pdf

We respectfully seek your support of HB 382. Thank you for your time and consideration of this excellent opportunity for the State of Maryland. If you have any questions, please do not hesitate to contact me at joel.kurzman@ncpa.org.

Sincerely,

Joel Kurzman

Director, State Government Affairs