July 31, 2024

[submitted electronically via: DHSS_DMMA_Publiccomment@Delaware.gov]

Andrew B. Wilson
Division Director
Planning and Policy Unit
Division of Medicaid and Medical Assistance
1901 North DuPont Highway
P.O. Box 906
New Castle, DE 19720-0906

RE: Pharmacists as Providers – SUPPORT

Dear Director Wilson:

The Delaware Pharmacists Society (DPS) and the American Pharmacists Association (APhA) appreciate the opportunity to provide comments on the proposed state plan amendment (SPA) to recognize and reimburse pharmacists as a provider type by Delaware Medicaid.[1] Our organizations would like to thank Governor Carney and the Division of Medicaid and Medical Assistance for the implementation of this important policy that will increase access to care for Delawareans. Realigning financial incentives in our health care system to allow for health plan reimbursement under the medical benefit of services provided by pharmacists ensures patients have more time with their most accessible health care professional, their pharmacist. It also properly aligns the current role of the pharmacist, with their extensive education and training, to practice at the top of their license.

Overall, our organizations support the proposed changes to Attachment 3.1-A Page 3.1 Addendum, Page 9 Addendum, and Attachment 4.19-B Page 1. We feel these proposed changes will increase Medicaid beneficiaries' access to the numerous health care services pharmacists provide in Delaware.

Additionally, our organizations request the Division publish an administrative notice confirming that pharmacists' services provided in federally qualified health centers (FQHCs) and rural health clinics (RHCs) will also be a covered benefit for Medicaid beneficiaries under the prospective payment system (PPS) methodology and the alternative payment methodology (APM). Our organizations also recommend the administrative notice include an explanation of the process for FQHCs and RHCs to update their encounter rates to include pharmacists' services.

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[1] https://regulations.delaware.gov/register/july2024/proposed/28%20DE%20Reg%2029%2007-01-24.htm

In the Delaware state plan, the definition of *FQHC Services and Other Ambulatory Services* defers to "section 4231 of the State Medicaid Manual",[2] and includes in the definition, "Any other ambulatory service included in a State's Medicaid plan is considered a covered FQHC service, if the FQHC offers such a service."[3] With the approval of the *Pharmacists as Providers* SPAs, pharmacists' services will be included in the State's Medicaid plan and should be a covered FQHC service. RHC services are broadly included with no limitations in the state plan[4] and should include pharmacists' services.

We believe that no additional changes to the SPAs is necessary and an administrative notice confirming that pharmacists' services provided in FQHCs and RHCs will also be a covered benefit for Medicaid beneficiaries under the prospective payment system (PPS) methodology and the APM will ensure patients in all outpatient health care settings can receive needed health care services from their trusted community pharmacist. Other states have taken similar steps. For example, the Ohio Department of Medicaid published a Medicaid Advisor Letter[5] on December 15, 2020, confirming that pharmacists' services were covered when provided in FQHCs and RHCs.

Our organizations greatly appreciate the Division's work to expand access to pharmacists' services to Medicaid beneficiaries. Thank you for your time and consideration of our comments. If you have any questions or require additional information, please don't hesitate to contact Kim Robbins, DPS Executive Director by email at rxistkim@gmail.com and E. Michael Murphy, PharmD, MBA, APhA Senior Advisor for State Government Affairs by email at mmurphy@aphanet.org.

Sincerely,

Kim Robbins   Michael Baxter
Executive Director   Vice President, Government Affairs
Delaware Pharmacists Society   American Pharmacists Association

About DPS: DPS was founded in 1886 as a non-profit, professional association for pharmacists in the state of Delaware. DPS members practice pharmacy in a variety of settings that include community pharmacies, health system pharmacies, long-term care facilities and ambulatory care sites. Pharmacist members of DPS provide many patient care services including patient education and health screening, wellness programs, tobacco cessation counseling, poison prevention education and adult immunizations. It is the mission of the Delaware Pharmacists Society to promote the health of the public through the practice of pharmacy. The Delaware Pharmacists Society exists to advocate on behalf of its members to ensure pharmacy professionals are engaged and valued as essential to the healthcare team so as to optimize patient outcomes.

About APhA: APhA is the largest association of pharmacists in the United States advancing the entire pharmacy profession, including 880 licensed pharmacists in Delaware. APhA represents pharmacists 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 government facilities. Our members strive to improve medication use, advance

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[2] Delaware State Plan Attachment 3.1-A Page 1
[3] State Medicaid Manual. Section 4231. Federally Qualified Health Center (FQHC) and Other Ambulatory Services. B. FQHC Services and Other Ambulatory Services.
[4] Delaware State Plan Attachment 3.1-A Page 1
[5] https://dam.assets.ohio.gov/image/upload/medicaid.ohio.gov/About%20Us/PoliciesGuidelines/MAL/MAL-653.pdf

patient care and enhance public health. APhA represents pharmacists and students who practice in numerous settings and provide care to many of your constituents. As the voice of pharmacy, APhA leads the profession and equips members for their role as the medication expert in team-based, patient-centered care. APhA inspires, innovates, and creates opportunities for members and pharmacists worldwide to optimize medication use and health for all.