

February 18, 2020

Sandra Puebla
Oklahoma Health Care Authority
4345 N. Lincoln Blvd.
Oklahoma City, OK 73105
via email: Sandra.Puebla@okhca.gov

Re: Proposed Rule Changes under OAC 317:30-5-86 Drug Utilization Review (DUR) Program

Dear Ms. Puebla:

On behalf of our members operating pharmacies in the Oklahoma, the National Association of Chain Drug Stores ("NACDS") thanks the Oklahoma Health Care Authority ("OHCA") for the opportunity to provide input on the proposed rule -- OAC 317:30-5-86 Drug Utilization Review (DUR) Program -- implementing the enhanced DUR requirements in the SUPPORT for Patients and Communities Act intended to promote safe and appropriate use of opioid medications. NACDS and our member companies are committed to pursuing policies and other initiatives to aggressively combat prescription opioid misuse, abuse, diversion, and addiction, while continuing to ensure that patients who legitimately require prescription opioids to manage their health conditions have access to this form of treatment. Accordingly, we support policies such as those outlined in Section 1004 of the SUPPORT for Patients and Communities Act that serve this purpose. NACDS thanks the OHCA for considering our comments on this rulemaking.

NACDS represents traditional drug stores, supermarkets, and mass merchants with pharmacies. In Oklahoma, chain pharmacy companies operate over 400 pharmacies and employ nearly 1,500 pharmacists. Across the country, chains operate over 40,000 pharmacies, and NACDS' over 80 chain member companies include regional chains, with a minimum of four stores, and national companies. Chains employ nearly 3 million individuals, including 157,000 pharmacists. They fill over 3 billion prescriptions yearly, and help patients use medicines correctly and safely, while offering innovative services that improve patient health and healthcare affordability. NACDS members also include more than 900 supplier partners and over 70 international members representing 21 countries. Please visit nacds.org.

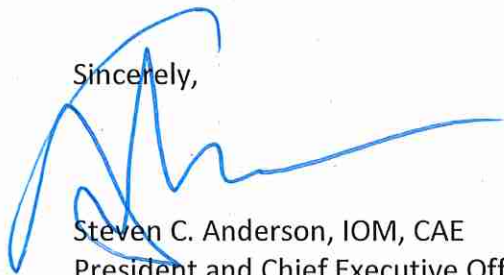
Among these enhanced DUR requirements outlined in Section 1004, the new law requires that states have in place safety edits for subsequent fills for opioids and a claims review process indicating when a beneficiary is prescribed a subsequent fill of opioids in excess

of any limitation that may be identified by the state. We are aware that the OHCA has policies in place for initial and subsequent opioid prescriptions¹. NACDS commends the OHCA for its work to implement policies that support more judicious prescribing of opioid medications, as these help to serve the important public health goal of reducing the incidence of opioid addiction and curbing prescription drug misuse and abuse.

NACDS thanks the OHCA for considering our comments on this matter. As Medicaid providers committed to delivering high-quality, safe, and appropriate patient care and to being part of the solution to the opioid-abuse epidemic, we remain steadfast in our efforts to work with policymakers to implement viable strategies to ensure legitimate patient access to controlled substance medications while also preventing drug abuse and diversion.

NACDS welcomes the opportunity to partner with the OHCA on policy initiatives that serve this purpose. If you have questions, please feel free to contact NACDS' Mary Staples via email at mstaples@nacds.org or by phone at 817-442-1155.

Sincerely,



Steven C. Anderson, IOM, CAE
President and Chief Executive Officer

¹ http://webserver1.lsb.state.ok.us/cf_pdf/2017-18%20ENR/SB/SB1446%20ENR.PDF (Accessed on February 14, 2020).