



NATIONAL ASSOCIATION OF  
CHAIN DRUG STORES

June 12, 2020

Ms. Janet Mann  
Director  
Arkansas Department of Human Services  
Division of Medical Services  
Office of Rules Promulgation  
P.O. Box 1437 (Slot S295)  
Little Rock, Arkansas 72203-1437

Via email: [ORP@dhs.arkansas.gov](mailto:ORP@dhs.arkansas.gov)

RE: Proposed Rule – SPA # 20-0013 Medication Assisted Treatment

Dear Director Mann:

On behalf of our members operating chain pharmacies in the state of Arkansas, the National Association of Chain Drug Stores (NACDS) appreciates the opportunity to comment on the proposed rule regarding Medication Assisted Treatment (MAT). We want to express our support for the new regulations associated with Arkansas Act 964 of 2019, which expands the availability of Opioid Use Disorder (OUD) medications and services for Medicaid eligible members.

NACDS and our member companies are committed to supporting policies and other initiatives to aggressively combat the opioid epidemic. We believe holistic approaches are needed not only to prevent misuse, abuse, diversion, and addiction from taking root, but also to provide treatment options for individuals who are currently suffering from opioid use disorders.

Section 211.105 of the new regulation is specific to pharmacies. The removal of prior authorization for preferred oral drugs for OUD helps alleviate administrative burdens on our pharmacists and enables patients to receive their prescriptions in a timelier manner. Additionally, allowing MAT drugs to be exempt from the monthly prescription benefit limit and copay requirement are important provisions which will improve access to these important OUD therapies.

NACDS is an active partner in helping states to address the opioid epidemic. We urge all states to utilize pharmacists to provide OUD medications and services to Medicaid beneficiaries and we thank the Division of Medical Services for taking action to address this important public health issue. If you have any questions, please do not hesitate to contact Mary Staples at [mstaples@nacds.org](mailto:mstaples@nacds.org) or 817-442-1155.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven C. Anderson".

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