



NATIONAL ASSOCIATION OF
CHAIN DRUG STORES

November 2, 2020

Wisconsin Department of Health Services
Division of Medicaid Services
Attn: Tiffany Reilly
1 W. Wilson St., PO Box 309
Madison, WI 53703

Email: dhsseniorecare@dhs.wisconsin.gov

Re: SeniorCare Waiver to Include Coverage of Vaccinations

Dear Ms. Riley:

The National Association of Chain Drug Stores (NACDS) is pleased to be writing in strong support of the proposed amendment to the SeniorCare waiver to include coverage of vaccinations. The COVID-19 pandemic reinforces the need for maximum immunization uptake. Administration of vaccines, including the COVID-19 vaccine is a monumental step toward overcoming the COVID-19 pandemic and other preventable illnesses, especially in high-risk populations such as those enrolled in Wisconsin SeniorCare. Passage of the proposed amendment would allow for community pharmacies throughout the state to successfully expand access to this essential patient care service for Wisconsin residents through the pandemic and beyond.

NACDS represents traditional drug stores, supermarkets and mass merchants with pharmacies. Chains operate nearly 40,000 pharmacies, including about 700 in Wisconsin, and NACDS' 80 chain member companies include regional chains, with a minimum of four stores, and national companies. Chains employ nearly 3 million individuals, including 155,000 pharmacists, and employ about 58,000 people in Wisconsin. 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.

The prevalence of vaccine-preventable diseases in adults remains a significant public health issue in the United States. Vaccinations reduce the rates of disease and improve overall lifespans by: controlling the spread of infectious diseases; mitigating the severity of disease; and, helping to protect unvaccinated people, including those who are contraindicated for the vaccine.¹ In addition to public health benefits, vaccines have a

¹ Winegarden, Wayne; "Promoting Access and Lowering Costs in Health Care: The Case of Empowering Pharmacists to Increase Adult Vaccination Rates;" (2018). https://www.pacificresearch.org/wp-content/uploads/2018/04/AdultVaccination_F_web.pdf

societal economic benefit. Vaccine-preventable diseases and deaths create an approximately \$9 billion economic burden on the healthcare system in hospital and doctor visits and loss of income each year.² Unfortunately, low immunization uptake, with immunization rates below Healthy People 2020 goals, has been observed.^{1,3} For example, pneumonia and influenza are the eighth leading cause of death in U.S. adults, and the pneumococcal vaccination rate was 64%, well below the 90% Healthy People 2020 target.⁴ As such, NACDS works to advance pharmacies as healthcare settings where patients are able to access cost-effective immunization services and quality patient care.

Since the emergence of COVID-19 in the U.S. in January this year, community pharmacies and their staff have served in critical roles as part of the pandemic response. Frontline pharmacy staff have attended to Americans every day during this pandemic emergency by keeping pharmacies open to offer COVID-19 testing, dispense critical medications, and provide patient education and referrals. Community pharmacies and the public health community have more than a decade of planning for pandemics together and have built upon the early successes of pharmacies as pandemic vaccinators during the 2009 H1N1 pandemic, including studies that show the importance of pharmacies and pharmacists in the deployment of vaccines and treatments.^{5,6} Notably, there has been a significant increase, more than 70%, in the number of patients receiving their flu shot at pharmacies in 2020 than in 2019.⁷ Thus, underscoring the vital impact pharmacies have within the community as an accessible and affordable healthcare destination to receive immunization services.

As documented by the Department of Health Services, Wisconsin observed a decrease in the overall number of immunizations administered beginning in mid-March and continuing through April 2020, in comparison to the average for the same time over the past 5 years for all age groups, including seniors⁸. Meanwhile, the unfolding COVID-19 pandemic continues to challenge healthcare systems and providers across Wisconsin and the country more broadly. Given the resurgence of new COVID-19 cases since mid-September, it is imperative that systems and providers, including pharmacies, continue to provide the best possible care for the public during this unprecedented time and

² Sachiko Ozawa, et al.; "Modeling the Economic Burden of Adult Vaccine-Preventable Diseases in the United States."; Health Affairs; November 2016. <https://www.healthaffairs.org/doi/full/10.1377/hlthaff.2016.0462>

³ Office of Disease Prevention and Health Promotion. U.S. Department of Health and Human Services. Healthy People 2020. Available at: <https://www.healthypeople.gov/2020/topics-objectives/topic/immunization-and-infectious-diseases#one>

⁴ Winegard, Wayne; "Promoting Access and Lowering Costs in Health Care: The Case of Empowering Pharmacists to Increase Adult Vaccination Rates;" (2018). https://www.pacificresearch.org/wp-content/uploads/2018/04/AdultVaccination_F_web.pdf

⁵ Koonin LM, Beauvais DR, Shimabukuro T, et al. CDC's 2009 H1N1 vaccine pharmacy initiative in the United States: implications for future public health and pharmacy collaborations for emergency response. *Disaster Med Public Health Prep.* 2011;5(4):253-255. Available from: <https://www.ncbi.nlm.nih.gov/pubmed/22146661>

⁶ Institute of Medicine Forum on Medical and Public Health Preparedness for Catastrophic Events. *The 2009 H1N1 Influenza Vaccination Campaign: Summary of a Workshop Series.* Washington (DC): National Academies Press (US); 2010. Available from: https://www.ncbi.nlm.nih.gov/books/NBK54185/pdf/Bookshelf_NBK54185.pdf

⁷ IQVIA National Prescription Audit (NPA)

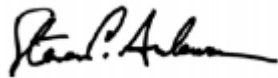
⁸ <https://content.govdelivery.com/accounts/WIDHS/bulletins/28c2843>

beyond. We commend the Department of Health Services for recognizing the importance of vaccinations and the role pharmacies can play in providing immunizations to the 93,000 Seniors served each month in the SeniorCare program.

Recognizing the impact of immunizations for all populations, especially seniors, fair and adequate reimbursement is essential to ensure pharmacies can sustainably provide necessary vaccinations. As you may know, 90% of Americans live within 5 miles of a pharmacy; however, despite the unparalleled accessibility, pharmacies are too often reimbursed at lower levels than other healthcare providers, such as physicians, offering the same service. Thus, NACDS strongly urges the Department of Health Services to not only recognize the importance of payment parity for healthcare professionals providing immunizations, but to provide accessible and affordable immunization services under the SeniorCare program.

Thank you very much for receiving our perspective. Please do not hesitate to contact Joel Kurzman via email at jkurzman@NACDS.org or by phone at (847) 905-0555.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven C. Anderson". The signature is fluid and cursive, with a prominent initial "S" and "A".

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