



NATIONAL ASSOCIATION OF
CHAIN DRUG STORES

May 23, 2022

Anthony Rubinaccio
Executive Director
New Jersey State Board of Pharmacy
PO Box 45013
Newark, NJ 07101
Submitted via RubinaccioA@dca.lps.state.nj.us

Re: Extend the Remote Processing Pilot Until the Pending Remote Processing Rulemaking Is Finalized

Dear Mr. Rubinaccio,

On behalf of our members operating pharmacies throughout the state of New Jersey, the National Association of Chain Drug Stores (NACDS) is writing to urge the New Jersey State Board of Pharmacy (Board) to extend the Remote Processing Pilot that is scheduled to expire on June 30, 2022 until the pending rulemaking to permanently allow for this activity is finalized.

Especially during the COVID-19 pandemic, participation in the pilot has afforded many New Jersey pharmacy providers with needed flexibilities to manage prescription processing operations while helping to meet public demand for pharmacy services. By allowing off-site pharmacy personnel including pharmacists and pharmacy technicians to perform various remote processing activities at unpermitted locations, the pilot has made it possible for pharmacies to shift work that can be safely completed offsite when needed, thereby freeing up onsite pharmacy staff to focus on activities that can only be completed in-person such as clinical care services and certain dispensing functions.

Since the start of the pandemic, pharmacies have been played a central role in the public health response by providing essential vaccination and testing services on top of other pharmacy care services. The experience of the last two years has only amplified the public's growing expectations and reliance on neighborhood pharmacies for the many valued healthcare services. As such, the need to maintain these flexibilities that enable work balancing practices continues.

By the Board's own account, approximately 127 pharmacies have implemented remote processing activities since the pilot's inception – the overwhelming majority of those having been implemented since 2020.¹ With the pilot scheduled to expire next month, those pharmacies would be forced to halt existing programs that have demonstrated the safety and workability of this process, which could then lead to disruptions in care where efficiencies had already been deployed through the allowances of the pilot.

In seeming recognition of the benefits of remote processing and the want to ensure that these activities can continue, the Board voted unanimously at the December 2021 meeting to extend the pilot until this coming June or until regulations have been promulgated – whichever would come sooner. As the rulemaking has not progressed as expeditiously as hoped, we ask the Board to act swiftly to further extend the Remote Processing Pilot until the pending rulemaking to permanently allow for this activity is finalized and in effect. If the Board does not wish to

¹ <https://www.njoag.gov/proposed-regulation-board-of-pharmacy-2022-0510a/>

extend this date until the rules effective date, we would then alternatively request another 6-month extension until December 31, 2022.

NACDS thanks the Board for considering our comments on this matter. Please contact NACDS' Anne Fellows, Director, State Government Affairs at afellows@nacds.org or 978-456-9235 with any questions or for further discussion.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven C. Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steven C. Anderson, FASAE, CAE, IOM
President and Chief Executive Officer
National Association of Chain Drug Stores

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NACDS represents traditional drug stores, supermarkets and mass merchants with pharmacies. 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 155,000 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.