



May 12, 2023

Kamlesh "Kam" Gandhi
Executive Director
Arizona State Board of Pharmacy
1110 W. Washington St., Suite 260
Phoenix, AZ 85007

Submitted via email to kqandhi@azpharmacy.gov

Re: Support for Proposed New R4-23-407.1; Prescribing a Self-administered Contraceptive

Dear Dr. Gandhi,

On behalf of our members operating chain pharmacies throughout the state, the National Association of Chain Drug Stores (NACDS) thanks the Arizona State Board of Pharmacy (Board) for the opportunity to comment on proposed new rule R4-23-407.1 that implements recent statutory changes for pharmacists to prescribe self-administered contraceptives under a standing prescription order. NACDS strongly supports policies like this that leverage pharmacy providers to improve access to essential medicines and clinical care services. We commend Arizona policymakers for pursuing policy changes that will broaden pharmacists' authority to deliver contraceptive care and encourage the Board to finalize this rulemaking to fully implement these allowances.

Expanding patient access to contraceptive care by leveraging the pharmacy setting can help to improve the health and well-being of women throughout the state. There are 61 million women of reproductive age in the United States and 70% of those are at risk for unintended pregnancy.¹ According to the American College of Obstetricians and Gynecologists (ACOG), nearly half of pregnancies are unintended – in large part due to barriers to contraceptive access.² With nearly 90% of Americans living within 5 miles of a pharmacy, highly qualified and accessible pharmacists are uniquely positioned to help connect more women to this care.

As neighborhood healthcare destinations, community pharmacies provide convenient, affordable, quality healthcare services to their patients. Pharmacies are regularly open nights and weekends and are sometimes the only available healthcare destination for patients in rural and underserved areas. Notably, 86% of Arizonans say it is very or somewhat easy to access pharmacies, ranking their accessibility the highest among healthcare destinations tested.³

The experience gained during the COVID-19 pandemic illustrates how impactful pharmacy providers can be in expanding access to essential healthcare services – especially in delivering needed care to medically underserved communities and for individuals from racial and ethnic minority groups that experience greater access barriers to healthcare services. Throughout the pandemic, pharmacies have been a critical access point for the provision of healthcare services for this otherwise underserved population of patients, as more than 40% of individuals vaccinated at pharmacies were from racial and ethnic minority groups.⁴ Further, 70% of the more than 20,000 COVID-19 testing sites, the majority of which are supported by pharmacies, are in areas with moderate to severe

¹ Cieri-Hutcherson N. How Pharmacists Can Play a Larger Role in Increasing Access to Contraceptives. Goodrx.com. <https://www.goodrx.com/hcp/pharmacists/advances-in-pharmacist-prescribing-of-new-contraceptives>. Published 2022. Accessed September 30, 2022.

² <https://www.acog.org/-/media/project/acog/acogorg/clinical/files/committee-opinion/articles/2015/01/access-to-contraception.pdf>

³ Morning Consult poll commissioned by NACDS; conducted Dec. 7-12, 2022. Poll results here: <https://accessagenda.nacds.org/dashboard/>

⁴ GAO, Federal Efforts to Provide Vaccines to Racial and Ethnic Groups, available at <https://www.gao.gov/assets/gao-22-105079.pdf>

social vulnerability.⁵ Expanded allowances for pharmacists to deliver contraceptive care can similarly help to address health disparities in various communities and populations by improving access to contraceptive care.

NACDS thanks the Board for the opportunity to share our perspectives on this important matter. If you have any questions or need additional information, please contact NACDS' Vice President, State Pharmacy and Advocacy Sandra Guckian at SGuckian@nacds.org or 703-837-4195.

Sincerely,



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 nearly 40,000 pharmacies, and NACDS' 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.

⁵ White House, FACT SHEET: Biden Administration Announces Historic \$10 Billion Investment to Expand Access to COVID-19 Vaccines and Build Vaccine Confidence in Hardest-Hit and Highest-Risk Communities, available at <https://www.whitehouse.gov/briefing-room/statementsreleases/2021/03/25/fact-sheet-biden-administration-announces-historic-10-billion-investment-to-expand-access-to-covid-19-vaccines-and-build-vaccine-confidence-in-hardest-hit-and-highest-risk-communities/>