



March 24, 2025

Ms. Lynne Keilman-Cruz
Interim Director/Health Care Services Office of the Governor
Division of Health Care Services
Director's Office
4601 Business Park Blvd., Bldg. K
Anchorage, Alaska 99503-7121

Re: *Concerns with the 2024 Cost of Dispensing Survey Results*

Dear Ms. Lynne Keilman-Cruz,

On behalf of our members operating in Alaska, the National Association of Chain Drug Stores (NACDS) is writing to express our deep concern regarding the *2024 Cost of Dispensing Survey Results* released by Myers and Stauffer. The results would significantly decrease professional dispensing fees for community pharmacies. Additionally, we are concerned with the short public commenting period of March 21, 2025, for Alaska pharmacy providers to thoroughly review, evaluate and analyze the survey's findings. Therefore, **we urgently request an extension of the public commenting period to review the recent study prior to the Alaska Department of Health (Department) drafting regulations and submitting a new Medicaid State Plan Amendment (SPA) to propose a new dispensing fee for implementation. Furthermore, we would like to request a meeting with the Department and Myers and Stauffer to discuss the study further to ensure it accurately reflects costs and pharmacies' unique role in providing care for Alaskans.**

Community pharmacies play a crucial role in providing medication access to Alaskans. The data from this study would impose a drastic drop in professional dispensing fees which raises significant concerns, necessitating a detailed analysis to ensure fair and adequate reimbursement from pharmacy benefits managers (PBMs). Consequently, these below-cost reimbursements hinder patient access and will only intensify if these survey findings truly reflect the cost of dispensing which we currently do not believe to be the case. In light of these considerations, additional time for pharmacy providers to assess the study's findings is essential

Thank you for your immediate attention to this request. We look forward to your favorable response and the opportunity to meet with you soon. For questions or further discussion, please contact NACDS' Mary Staples, Director, State Government Affairs at mstaples@nacds.org or 817-308-2103.

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.