March 17, 2020

Michael Consedine  
CEO of NAIC  
1100 Walnut Street, Suite 1500  
Kansas City, MO 64106-2197

Dear Mr. Michael Consedine:

As our nation works tirelessly to address the coronavirus (COVID-19), on behalf of the pharmacy benefit management (PBM) industry, the Pharmaceutical Care Management Association (PCMA) affirms our commitment to support federal, state, and local public health agencies; as well as the White House Coronavirus Task Force headed by Vice President Michael Pence; collaborate with health care providers, first responders, and others; and work closely with American businesses, labor unions, and government programs to ensure working families, seniors, individuals with disabilities, and others get the prescription drugs they need in a timely and cost-effective manner, including at home.

As you know, President Trump declared a national emergency Friday, March 13th, that waives current regulations. Our companies are fully prepared to provide early access to prescription refills, access to therapeutic alternatives in the event of COVID-19 related shortages, and address pharmacy access barriers in collaboration with policymakers, clinicians, payers, and other essential partners. Upon approval of a vaccine or specific treatments for COVID-19, our companies will work with health plans to provide appropriate access for patients. We are confident that our health care system can appropriately manage the diagnosis and treatment of patients with COVID-19, but we must remain vigilant and continue the close collaboration between public and private-sector partners to work through any challenges.

We recognize the essential role that prescription drugs play in helping hundreds of millions of Americans maintain good health. Patients should have the confidence that adequate prescription drug supplies continue to be available. If a shortage for a specific medication does occur, PBMs will work with the patient, his or her prescriber, and health plan to identify a covered therapeutic alternative. To help facilitate access to our nation’s nearly 70,000 retail pharmacies, our companies are actively providing information to RxOpen, a central hub created after Hurricane Katrina to help ensure uniform, consistent supply-chain information is provided to stakeholders. In addition, PBMs are already working with patients to address early refill needs and provide other resources.

While COVID-19 itself is a new public health challenge, our companies have substantial experience in helping to mitigate prescription drug access concerns in the event of natural disasters, including floods, wildfires, hurricanes, and tornadoes. We have learned from previous regional and global health care events, such as Zika, Ebola, and the H1N1 virus. We prepare annually for recurring health care events, including the influenza season.
We commend your work and stand ready and willing to share our expertise. COVID-19 is yet another reminder of the need for robust private-public partnerships to facilitate the health and well-being of every American.

Most Respectfully,

JC Scott
President and Chief Executive Officer

Cc: Assistant Director, Life & Health Policy and Legislation, NAIC, Brian Webb