

From: [Matthews, Jolie](#)
To: [Matthews, Jolie](#)
Subject: FW: NACDS' Comments on Proposed Revised 2024 PBM Subgroup Charges by Friday, April 19
Date: Friday, April 19, 2024 3:14:55 PM

From: Sandra Guckian <SGuckian@nacds.org>
Sent: Friday, April 19, 2024 3:10 PM
To: Matthews, Jolie <JMatthews@naic.org>
Subject: NACDS' Comments on Proposed Revised 2024 PBM Subgroup Charges by Friday, April 19

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Hello Ms. Matthews,

On behalf of the National Association of Chain Drug Stores (NACDS), I am writing to comment on the proposed charges of the PBM Subgroup of the Health Care and Insurance (B) Committee. We very much appreciate the ongoing engagement from NAIC and the Subgroup on PBM regulation, an issue of utmost importance to community pharmacies across the nation.

In reviewing the proposed charges, NACDS would like to reiterate the importance of PBM licensure and state regulatory enforcement. While the emergence of greater regulation of PBM actions is essential, so, too is a regulatory structure which adequately equips states to respond to potential violations of the law, whether through fines and other civil penalties, revocation of licensure (if required by the state), or both. This could be accomplished by including model language in NAIC's Model Act #22 pertaining to Prescription Drug Benefit Management, which is included under item "C" of the Subgroup's proposed charges. Furthermore, we express support and alignment with similar comments submitted by the National Community Pharmacists Association (NCPA) and urge the focus on PBMs, particularly enforcement of current laws, to continue to help protect patients and patient access to pharmacies in local communities across the country.

NACDS stands ready and willing to continue working with NAIC on issues related to PBM regulation, and we again thank you for your attention to this matter.

Sincerely,

Sandra Guckian

[Sandra Kay Guckian, IOM, MS, RPh](#)

Vice President, State Pharmacy and Advocacy

sguckian@nacds.org

P: (703) 837.4195

F: (703) 549.0772

C: (703) 774.4801

National Association of Chain Drug Stores (NACDS)

1776 Wilson Blvd. Suite 200 Arlington, VA 22209

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