

Submitter : Mr. CLARENCE ELLISON

Date: 10/19/2007

Organization : COOR'S PHARMACY

Category : Pharmacist

Issue Areas/Comments

Average Manufacturer Price

Average Manufacturer Price

As an independent pharmacy owner and pharmacist in a rural community I am greatly concerned about the possible impact of proposed AMP on Medicaid reimbursements and the entire healthcare system as a whole. The president's comments on pharmacy "overcharging the system" is a slap in the face after a Medicare D plan was railroaded, thrown together and left for pharmacy to sort out. Be that as it may, it is hard to understand how a proposed plan that will require pharmacies to sell some medications for less than they actually paid for it is confounding. Is there any legitimate business that can sell a product for less than they paid for it and expect to stay in business?! Unless things are adjusted to a reasonable cost strategy for pharmacy AMP (which excludes facilities like hospital pharmacies that can obtain medications at greatly discounted prices that are not available to retail pharmacies) then the sound you hear will be the doors on many independent pharmacies closing shut on the thousands of Medicaid recipients that they have loyally served for so many years. Does the healthcare system need evaluation-yes. I support cost restraints that benefit the system and not a select few PBMS. However I can not see being forced to sell below cost and trying to remain solvent. Is this the intent of government to force competition out of the marketplace? Walmart has dug the grave for many an honest merchant and now AMP is burying free trade. For many medicaid recipients there is looming on the horizon a situation that may very well leave them unable to find a pharmacy willing to serve their needs if AMP is not re-evaluated. If the system is broke then try to fix it, but do not completely scrap the pharmacies and patients that are caught in the middle. I respectfully request that AMP pricing that will sop greatly affect retail pharmacy be limited more to polling retail pharmacy for acquisition costs and exclude non-retail government contracted pharmacy outlets and PBMs. It is time to insure the health and well being of thousands of people in our country.

Submitter : Susan Malerk

Date: 10/30/2007

Organization : Susan Malerk

Category : Pharmacist

Issue Areas/Comments

Average Manufacturer Price

Average Manufacturer Price

The future AMP reimbursement is unfair. We are a retail establishment that services several Long Term Care facilities and so we have many Medicaid recipients. We do not get preferential pricing for servicing these clients and, of course, generics are preferred and well utilized. Fair AMP pricing is crucial to our continuing to provide for these patients. Please reconsider AMP reimbursement rates.

Submitter : Dr. Sue Kollhoff
Organization : Patterson Pharmacy
Category : Pharmacist

Date: 11/08/2007

Issue Areas/Comments

Average Manufacturer Price

Average Manufacturer Price

I am very disappointed with the rulings so far regarding AMP. If this figure is to be used to determine pharmacy reimbursement, it needs to be a fair reflection of community pharmacy acquisition costs (i.e., excluding pharmacies that are able to purchase medications at deep discounts, such as mail-order pharmacies). In addition, a fair dispensing fee should be associated with each prescription. As a pharmacist, I spend a large portion of my day discussing medication interactions with patients and physicians, counseling patients on their medications, and making recommendations for generic substitutions that ultimately save the healthcare system valuable dollars. Therefore, I do not believe it is unreasonable to receive a fair dispensing fee to cover these activities. Please consider that a pharmacist's role is much more than just filling a prescription, and as such, please recognize the value we add to the healthcare system by fairly reimbursing us for our hard work.

Submitter : Mr. Corey Brand

Date: 11/09/2007

Organization : Student (ONU)

Category : Pharmacist

Issue Areas/Comments

GENERAL

GENERAL

After reading the article in "Pharmacy Today" I am concerned about the future of the profession of pharmacy. Rule makers should be educated on the role of pharmacists in the retail sector above simply dispensing. We also answer questions and counsel patients. This is huge as having patients take their medications properly is imperative to their health. Many patients are confused about their medications and the time we spend with them is valuable and should be compensated for. Using the argument that there are \$4 generics on the market is ridiculous. Mass merchants are loss leaders and their pharmacy sector is losing money, their pharmacists are stressed with the work load, and I am willing to bet the patients seldomly have interactions with a pharmacist. No, our computers do not do all of our work. I am currently a 6th year student at Ohio Northern University and I am doing a rotation with the VA. The number of uncontrolled diabetics and patients with uncontrolled hypertension is shocking. I find myself walking with these patients in the hall and what not telling them how to make their meds work for them and they are so grateful. Nobody else has the time to do it, and this is in a government ran facility. It is our tax dollars that will be spent, and is being spent on the consequences on the eyes, kidneys, and heart. Instead of looking to cut the funds going to pharmacists, we should be looking for ways to increase patient interactions. There is more than ample data to show that money spent on pharmacists is money well spent. Having to fill more scripts per unit of time can only hurt the healthcare system. I would love to know that someone actually read this (c-brand@onu.edu)

Submitter : Mr. Robert Riley
Organization : Robert Riley, P.C.
Category : Attorney/Law Firm

Date: 11/26/2007

Issue Areas/Comments

Average Manufacturer Price

Average Manufacturer Price

Please clarify if rebates paid to a PBM for mail order utilization of a manufacturer's product should be included in the AMP calculation for the product where, instead of the PBM, a mail order pharmacy, that is not under common ownership with the PBM, makes all of the mail order product purchases and sales underlying the PBM's mail order utilization, and the PBM pays this non-affiliated mail order pharmacy a negotiated ingredient cost and dispensing fee for the manufacturer's product dispensed at mail to the PBM's plan sponsor members, but no portion of the rebates.