

NCPA Update September 5-9, 2022

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NCPA's Month of Action a Success with Opportunities for Pharmacy Visits Remaining

NCPA's Month of Action has ended. For the month, 60 visits with legislators, or administration officials, occurred or were planned, including 22 visits with legislators on key committees or leadership. CMS Administrator Chiquita Brooks-Lasure has participated in a visit.

Recent visits include Reps. Rick Allen (R-Ga.) visiting Barney's Pharmacy; Mike Bost (R-Ill.), visiting Byrd-Watson pharmacy; Salud Carbajal (D-Calif.) visiting San Ysidro Pharmacy; and Ben Cline (R-Va.) visiting Buena Vista Pharmacy.

These are just a few of the many pharmacy visits hosted by NCPA members over the past month. Hosting a legislator or their staff member in your pharmacy is an effective way to build a lasting relationship. Check out [this video](#) of Rep. Buddy Carter (R-Ga.) and NCPA Vice President Michael Kim discussing how to effectively host a legislator. While the August recess has ended, it looks likely that Congress will also be out of session for most of October, so if you have not yet extended an invitation don't delay any further! You can still let us know of your interest in hosting a pharmacy visit by completing this [interest form](#) or by emailing [Michael Rule](#). Click [here](#) for NCPA's news release on the Month of Action.

NCPA Recaps 2022 State Legislative Wins

This week, NCPA released its annual report on major pieces of state legislation, addressing Medicaid managed care reform, PBM reform and expansion of scope of practice/payment for services, passed since January 2022. This resource contains bill summaries, as well as links to the actual legislation. It can be found [here](#).

NCPA Highlights Dangers of Additional Health Care Mergers in Joint Op-Ed

In an op-ed for *American Prospect*, NCPA General Counsel Matt Seiler and Matt Stoller of the American Economic Liberties Project explain the danger of allowing yet another health care merger to go through and the harm it will do to independent pharmacies. "Despite being vital providers, local pharmacists are

under attack from massive vertically and horizontally merged companies,” Seiler and Stoller write. Read the op-ed [here](#).

NCPA Advocates for Patient Access to Medically Necessary Medications

This week, NCPA joined the American Medical Association (AMA), American Pharmacists Association (APhA), and the American Society of Health-System Pharmacists (ASHP) on a joint statement raising concerns about state laws that limit patients’ access to medically necessary medications and impede physicians and pharmacists from using their professional judgment in the wake of the *Dobbs v. Jackson Women’s Health Organization* decision. The statement called on policymakers to ensure that patient care is not disrupted and that physicians and pharmacists shall be free to continue to practice medicine and pharmacy without fear of professional sanction or liability. Read the full statement [here](#).

Survey Shows Pharmacists Generally Unprepared for DSCSA Requirements Taking Effect in November, 2023

NCPA surveyed roughly 8,000 pharmacy owners on their overall knowledge of and preparation for the DSCSA interoperability requirements to take effect on November 27, 2023 and received 256 responses.

Among the key findings:

- 71.5 percent of respondents either are generally aware of the DSCSA requirements for dispensers that take effect in 2023 but did not understand them well (46.5 percent), or were not aware of the requirements (25 percent).
- 60.0 percent of community pharmacists are not prepared to meet the 2023 transaction information (TI) requirements.
- 60.2 percent of community pharmacists are not prepared to meet the DSCSA dispenser requirement to verify a suspect or illegitimate product.
- A majority of community respondents answered “I don’t know” to the following questions:
 - o Do you believe you have sufficient product master data (GTIN, product description, dose, strength, etc.) to enable compliance with Nov. 27, 2023, requirements moving from lot number tracing to serial numbers? (66.5 percent)
 - o As part of DSCSA’s Nov. 27, 2023 requirements, do you plan to use a portal or a standalone solution? (68.9 percent)
 - o What is your expected method for verification with the manufacturer? (58.5 percent)
- Though not a majority, “I don’t know” was the most common answer response to the question asking if respondents plan to have the ability to scan and use 2D barcodes to confirm receipt of products (rather than the current UPC linear barcode) (40.7 percent)

The full results are available [here](#).

NCPA is working diligently with supply chain partners to ensure that members are ready for the DSCSA interoperability requirements that take effect November 27, 2023. To stay current on DSCSA, attend NCPA’s presentation from Lisa Schwartz at our annual convention entitled “What You Need to Know (and Do) to Comply with the Drug Supply Chain Security Act” on Oct 2 from 8:15-9:15 in room 2502, and education materials on HDA’s [microsite](#).

NCPA to Host Webinar on DSCSA on November 3

On November 3, NCPA will host Supply Chain Security and Upcoming NDC Changes, a one hour CE

webinar featuring speakers Connie Jung and Julian Chun from FDA. Our speakers will talk about the requirements for your pharmacy from DSCSA and give insight into the proposed NDC changes. Register [here](#).

CDC Guidelines on COVID Boosters

The new bivalent products are the only products that should be used as boosters for the age groups for which they are authorized. Monovalent mRNA COVID-19 vaccines are no longer authorized as a booster in people over 12 years old. In fact, if a monovalent product is given after Aug. 31 as a booster in this population, the CDC is asking pharmacies to report that to the VAERS system. The manufacturer of bivalent product used for a booster does not have to be the same as any previous primary or booster doses.

Also, CDC is reframing what it means to be up to date with COVID-19 vaccination. You are up to date if you have completed a primary series and received the most recent booster dose recommended for you by CDC. The [schedule at-a-glance](#) for most people and for moderately or severely immunocompromised people is updated to reflect this change. The search function on the [CDC's vaccine locator website](#) for the bivalent COVID-19 boosters went live on Sept. 6. The public can find updated Moderna and Pfizer-BioNTech boosters as well as flu vaccines on that site. NCPA has also created this [informative resource](#) for pharmacies on COVID-19 vaccine billing and reimbursements.

NCPA Submits Physician Fee Schedule Comments

NCPA submitted comments to the Medicare Part B physician fee schedule proposed rule. The [comments](#) included asking CMS to reduce barriers for pharmacists providing services including diabetes self-management training (DSMT), continuous glucose monitoring (CGM), the Medicare Diabetes Prevention Program, and annual wellness visits. NCPA also strongly recommended add-on payments for at-home administration of influenza, pneumococcal, hepatitis B virus, and all vaccines recommended by the CDC Advisory Committee on Immunization Practices (ACIP). NCPA also asked CMS to maintain the \$40 payment for COVID-19 vaccine administration following the PHE's expiration.

NCPA Submits Comments to FDA on Track and Trace

NCPA submitted two comments to FDA on its proposed guidances to the track and trace law – one on [interoperability](#), and one on [trading partners](#). On interoperability, NCPA asked that FDA be prepared to exercise enforcement discretion if an otherwise authorized trading partner continues to rely on a web portal for maintaining transaction history, transaction statement, and transaction information received previously, and clarify that a pharmacy is not required to convert paper-based or web portal-based records to the EPCIS standard. In the comment regarding guidance on trading partners, NCPA supported FDA's definition of authorized trading partners, and NCPA further supported that FDA is clarifying that "a dispenser who transfers product to another dispenser for a specific patient need" is not a wholesaler.

CMS Hosting Medicare Open Enrollment Bootcamp Webinars

CMS will be hosting bootcamp webinars for providers to assist patients enrolling in Medicare 2023 plans. The webinars will be held September 28 and 29 from 1 –2:30 PM EST. Details with registration information can be located [here](#) one week prior to the webinars.

Compounding Advocacy Day: September 15

The Alliance for Pharmacy Compounding (APC) has designated September 15 as Compounding Advocacy Day. APC would like to supplement its [APC's Compounders on Capitol Hill event](#) and congressional visits that day with supportive messaging from compounders back home. Even if you're unable to attend that day, you and your team members can still advocate from afar.

More details are coming soon, and the [landing page](#) will open on September 14

NCPA State Legislative Activity Update

NCPA tracks state legislation related to our top three state priorities: [Medicaid reform](#), [scope of practice and compensation for services](#), and [PBM reform and regulation](#). Click each issue for a report of bills that have been introduced so far this session specifically dealing with these three issue areas. You can access the individual bill language and basic information on the bill by clicking on the bill numbers in the attached report. Bills that have moved this week are listed at the top in the "Recently Updated" section.