

August 27, 2020

The Honorable Frank Pallone
Chairman, Energy & Commerce Committee
United States House of Representatives
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Greg Walden
Ranking Member, Energy & Commerce Committee
United States House of Representatives
2322 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Pallone & Ranking Member Walden:

The National Community Pharmacists Association (NCPA) is writing today in response to the committee's investigation of the impact of the U.S Postal Service's (USPS) operational changes on the delivery of mail order prescription drugs to patients.

NCPA represents America's community pharmacists, including 21,000 independent community pharmacies. Almost half of all community pharmacies provide long-term care services (LTC) and play a critical role in ensuring patients have immediate access to medications in both community and LTC settings. Together, our members represent a \$76 billion healthcare marketplace, employ approximately 250,000 individuals, and provide an expanding set of healthcare services to millions of patients every day. Our members are small business owners who are among America's most accessible healthcare providers.

NCPA has long had concerns with mail order pharmacies. Starting in 1990, the NCPA House of Delegates passed resolutions citing concerns with mandatory mail order, temperature exposure, and patient health including this one:

Unregulated Mail Order Drug Programs

Mail order drug programs represent a serious threat to public health. It is not possible for mail order drug vendors, which lack face-to-face contact with patients, to comprehensively monitor their patients' health status, gather information on the full spectrum of their prescription and nonprescription drug use patterns, or adequately assess their understanding and compliance with drug therapy.

NCPA questions the integrity of a drug distribution system that relies exclusively on the mail and in which drugs are dispensed in excessive volume, over long distances, often exposed to extreme temperatures or humidity, delayed, and otherwise compromised. NCPA supports legislative and regulatory actions that apply professional and consumer protection standards to mail order vendors and urges appropriate officials to investigate the practice and subject mail order drug vendors to appropriate state and federal consumer protection laws, including state pharmacy practice acts.

Sadly, these concerns continue today and are more relevant than ever given the reports of USPS delays in delivery of mail and packages. Over the past few decades, PBMs have pushed patients into mail order citing cost savings, especially in federal health programs. Patients are steered into mail order pharmacies which are owned by or affiliated with PBMs, which are often owned by or affiliated with the health plans hired to provide medical coverage. More than 60 percent of all specialty revenue flows through the control of the big three PBMs/health plans, which is a major driver of the ultra-expensive prescriptions flowing through the mail.

While mail order usage has been growing during the pandemic, mail order prescriptions have become more expensive than traditional retail pharmacies. According to data from IQVIA, mail order prescriptions are 8 times more costly than a retail pharmacy: \$564.81 for the average mail order prescription compared to \$71.27 for the average prescription from a retail pharmacy. In 2018, sales of mail order prescriptions in the U.S. totaled nearly \$120.7 billion (excluding rebates), with residents of some states more likely than others to use mail order pharmacies.

NCPA has also had longstanding concerns about waste and safety of mail order prescriptions. Patients report that they request, beg, even plead, with mail order pharmacies to stop shipping medications that have been discontinued or are even for a deceased loved one, often to no avail. Often, patients even attempt to bring these unneeded drugs to their local community pharmacy for others to use, but there is no option but to dispose of thousands of dollars' worth of prescription drugs. There are also concerns about degradation of prescription drugs sent through the mail and if they are safe and effective for patients to take after being delayed, poorly handled, and not maintained at certain temperatures.

NCPA urges the committee to investigate the cost and safety of mail order prescriptions as a part of its investigation into USPS operational changes and possible delays of mail and packages. The committee should consider the impacts of delays on drug safety, as well as patient concerns of being forced into costly and sometimes wasteful mail order pharmacies. NCPA thanks the committee for its concern for patients and their timely access to vital medications, and we look forward to working with you to ensure that all medications in our nation's supply chain are safe and cost effective for patients.

Sincerely,



Karry K. La Violette
Senior Vice President of Government Affairs & Director of the Advocacy Center
National Community Pharmacists Association