

National Association of Chain Drug Stores (NACDS)

Non-Emergency Medical Transportation (NEMT) and Pharmacy Benefits Manager (PBM) Request for Comment	
RFI Question	Response
If Medicaid were to change its current broker model for non-emergency medical transportation (NEMT), what changes would you recommend?	N/A
If Medicaid were to change its current pharmacy benefit manager model, what changes would you recommend?	<p>The National Association of Chain Drug Stores (NACDS) appreciates the opportunity to offer input on ways the LDH can improve the pharmacy benefit delivery models used by the state’s Medicaid managed care organizations. Although we are providing the following high-level thoughts through this survey system, we welcome the opportunity to meet with LDH to discuss our input further. At a minimum, we urge LDH to consider the following:</p> <ol style="list-style-type: none"> 1. Policies that would help ensure patient access to their accessible neighborhood pharmacies by promoting the ability for any willing pharmacy to participate in a managed care organization’s network, provided that a pharmacy accepts the terms and conditions of that network. 2. A policy that would carve out the prescription drug benefit from the Medicaid managed care program to the state’s fee-for-service program. Such policy could both preserve access to pharmacies for Medicaid patients, while simultaneously helping to ensure that pharmacy costs are covered in alignment with the state’s adoption of reimbursement methodology in its fee-for-service program. 3. Additionally and in the alternative, a policy that would uniformly apply to all pharmacies the state legislature’s adoption of a Medicaid managed care reimbursement methodology that seeks to ensure a pharmacy’s costs are covered, which aligns with methodology used under the state’s Medicaid fee-for-service program. In previous years, the state legislature has chosen to limit, among other considerations, such Medicaid managed care reimbursement methodology to pharmacies “domiciled” in the state and with fewer than 10 locations under its corporate umbrella. Such limitation is arbitrary,

National Association of Chain Drug Stores (NACDS)

unfair, and discriminatory, the latter of which could raise certain legal concerns.

Thank you again for your consideration of our input. Please contact Mary Staples, mstaples@nacds.org, should you have any questions.

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