

DHS Responses to Public Comments Regarding Medication Assisted Treatment including the following provider manuals: Federally Qualified Health Center-1-19, Hospital-5-19, Nurse Practitioner-3-19, Outpatient Behavioral Health Services-1-19, Physician-4-19 and Rural Health Clinic-1-19; Pharmacy-2-19; Section I-4-19; State Plan Amendment #2020-0013

Steven C. Anderson, President and Chief Executive Officer, National Association of Chain Drug Stores

Comment: Dear Director Mann:

On behalf our members operating chain pharmacies in the state of Arkansas, the National Association of Chain Drug Stores (NACDS) appreciates the opportunity to comment on the proposed rule regarding Medication Assisted Treatment (MAT). We want to express our support for the new regulations associated with Arkansas Act 964 of 2019, which expands the availability of Opioid Use Disorder (OUD) medications and services for Medicaid eligible members.

NACDS and our member companies are committed to supporting policies and other initiatives to aggressively combat the opioid epidemic. We believe holistic approaches are needed not only to prevent misuse, abuse, diversion, and addiction from taking root, but also to provide treatment options for individuals who are currently suffering from opioid use disorders.

Section 211.105 of the new regulation is specific to pharmacies. The removal of prior authorization for preferred oral drugs for OUD helps alleviate administrative burdens on our pharmacists and enables patients to receive their prescriptions in a timelier manner. Additionally, allowing MAT drugs to be exempt from the monthly prescription benefit limit and copay requirement are important provisions which will improve access to these important OUD therapies.

NACDS is an active partner in helping states to address the opioid epidemic. We urge all states to utilize pharmacists to provide OUD medications and services to Medicaid beneficiaries and we thank the Division of Medical Services for taking action to address this important public health issue. If you have any questions, please do not hesitate to contact Mary Staples at mstaples@nacds.org or 817-442-1155.

Response: Thank you for your support.