



November 28, 2023

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services (CMS)
Department of Health and Human Services
Attention: CMS-4201-P, Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

SENT BY EMAIL

Dear Administrator Brooks-LaSure:

Thank you again for meeting with us last month to discuss several vital issues impacting our nation's pharmacists. As we approach World AIDS Day this Friday, December 1st, I wanted to reaffirm pharmacists' commitment and role in supporting the end of the HIV epidemic.

As one of the most accessible and trusted health care providers in their communities, pharmacists have a significant role to contribute in initiating access to HIV PrEP/PEP and providing culturally competent and culturally sensitive care. Nearly 90% of the U.S. population lives within five miles of a community pharmacy and this high level of accessibility allows pharmacists to serve in a unique role as another point of entrance for patients to get integrated into longitudinal and acute HIV preventative services.

As you know, leveraging the current health care workforce, including pharmacists, is a key component of President Biden's National HIV/AIDS Strategy, which recommends "expanding prescribing authority and reimbursement of services for PrEP and PEP to pharmacists and other providers." CMS action is needed to help make that happen.

Earlier this month, over 45 public health and advocacy leaders, including APhA, convened to strategize on how to equitably expand access to HIV prevention services by leveraging the 70,000 community pharmacies. The establishment and success of pharmacist-provided HIV PrEP/PEP is dependent on ensuring coverage for pharmacists' patient care services by Medicare Part B and Medicaid. All agreed that utilizing community pharmacies is required in the battle against HIV across the country.

As we approach the 35th anniversary of World AIDS Day, APhA strongly urges CMS to join with other Administration partners to put in place [administrative pathways](#) to expand Medicare and Medicaid coverage of pharmacist-provided services to increase patients' access to care.

We are also aware that oral HIV PrEP is being considered through a National Coverage Determination (NCD) to be moved from Medicare Part D to Medicare Part B. From discussions with our members, we believe this will significantly *negatively impact* patient access to HIV PrEP and unintentionally could increase our nation's HIV transmissions.

We need your bold leadership, now more than ever. CMS actions can make a significant difference in ending the HIV epidemic by 2030 by supporting pharmacy access. We would welcome the opportunity to meet with you and your team before December 1 to discuss barriers CMS must break down to enable pharmacists and pharmacies to make a difference in our collective battle against HIV. You can contact me at ibernstein@aphanet.org or 202-429-7533

Sincerely,

A handwritten signature in black ink that reads "Ilisa BG Bernstein". The signature is written in a cursive, flowing style.

Ilisa BG Bernstein, PharmD, JD, FAPhA
Senior Vice President, Pharmacy Practice & Government Affairs