



July 24, 2020

The Honorable Nancy Pelosi  
Speaker of the House  
H-232, The Capitol  
Washington, D.C. 20515

The Honorable Kevin McCarthy  
House Minority Leader  
H-204, The Capitol  
Washington DC 20510

The Honorable Mitch McConnell  
Senate Majority Leader  
S-230, The Capitol  
Washington D.C. 20510

The Honorable Chuck Schumer  
Senate Minority Leader  
S-221, The Capitol  
Washington, D.C. 20515

**RE: APhA Recommendations on Ways to Maximize the Use of Pharmacists to Prevent, Treat, Test and Respond to Coronavirus**

Dear Speaker Pelosi, Minority Leader McCarthy, Majority Leader McConnell, and Minority Leader Schumer:

We are writing to request that Congress take immediate action to address the urgent need to expand COVID-19 testing services for Americans during the pandemic by passing legislation recognizing pharmacists as providers of COVID-19 and influenza testing and immunization services. Despite actions made by the Administration to ease regulatory burden on pharmacists testing for COVID-19, unfortunately a statutory barrier still exists preventing widespread uptake of these services, including for those in rural and underserved areas from accessing this important public health service.

APhA represents pharmacists, pharmaceutical scientists, student pharmacists, pharmacy technicians, and others interested in improving medication use and advancing patient care. APhA members provide care in all practice settings, including community pharmacies, specialty pharmacies, hospitals, long-term care facilities, community health centers, physician offices, ambulatory clinics, managed care organizations, hospice settings, and the uniformed services. APhA has a track record as a strong partner with the Department of Health and Human Services, Food and Drug Administration, Centers for Disease Control and Prevention, and other agencies in addressing public health needs including, immunizations, emergency preparedness, substance use disorder/opioids, diabetes, and other public health concerns.

To ensure appropriate and timely access to needed services necessary to respond to the current pandemic – including testing, immunization and other services – Congress must authorize pharmacists provider status in Medicare Part B. Doing so would allow pharmacists and pharmacies to bill Medicare directly for testing and immunization services provided by their employee pharmacists as Medicare providers.

Unfortunately, without a reliable and clear avenue to pay pharmacists for their services, including patient assessment, specimen collection, performing the test, interpreting the results, and reporting the results to the patient and appropriate authorities, the public health goal of widespread and accessible testing for COVID-19, influenza and respiratory syncytial viruses in communities cannot be achieved.

Access to testing is even more limited by racial disparities; ZIP codes where the population is at least 75 percent white have an average of one testing site for every 14,500 people<sup>1</sup>, as compared to ZIP codes that are at least 75 percent people of color have an average of one testing site per 23,300 people.<sup>2</sup>

Furthermore, more than 360,000 pharmacists have been trained to administer vaccines for patients of all ages.<sup>3</sup> Pharmacists are the most accessible health care provider and provide care and services in a wide variety of practice settings in communities across our nation – making them uniquely qualified to reduce clinical burdens and improve patient health. In fact, 90% of all Americans live within five miles of a community pharmacy.<sup>4</sup> In addition to being medication experts, pharmacists also provide a broad array of services beyond dispensing medications.<sup>5</sup> Our members are well-positioned to work collaboratively with the government to intervene and provide meaningful services to curb further outbreaks of the coronavirus and play an integral role in containment and mitigation.

America's pharmacists stand ready and able to provide the patient care services necessary to help meet the public health needs created by the spread of the coronavirus. **To unleash the full potential of pharmacists' contributions for testing and immunization, Congress must designate pharmacists as providers under Medicare Part B for COVID-19, influenza, and RSV testing and immunization.** An all-in approach is necessary to address this pandemic. Now is not the time to erect silos, rather, healthcare professionals must support each other and work together in providing testing, immunizations, and patient care for all Americans. We look forward to working with you to continue to provide meaningful services to meet the public health challenge created by the coronavirus – which can serve as an effective mechanism to combat additional public health emergencies in the future. If you have any questions, or if we can be of any assistance, please do not hesitate to contact Alicia Kerry J. Mica at [amica@aphanet.org](mailto:amica@aphanet.org).

Sincerely,



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

CC: The Honorable Charles Grassley, Chairman, U.S. Senate Committee on Finance  
The Honorable Ron Wyden, Ranking Member, U.S. Senate Committee on Finance  
The Honorable Lamar Alexander, Chairman, U.S. Senate Committee on Health, Education Labor and Pensions  
The Honorable Patty Murray, Ranking Member, U.S. Senate Committee on Health, Education Labor and Pensions  
The Honorable Frank Pallone, Chairman, U.S. House Committee on Energy and Commerce

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<sup>1</sup> <https://www.axios.com/minorities-coronavirus-testing-9a6397e4-a7e7-4077-bad2-bbd77fe5d1c2.html>

<sup>2</sup> S. Lawrence Kocot, Health Affairs, *Expand COVID-19 Testing With Real-Time Processing Through Community Pharmacies* (July 1, 2020), available at <https://www.healthaffairs.org/doi/10.1377/hblog20200629.567658/>.

<sup>3</sup> APhA 2019 Annual Report.

<sup>4</sup> NCPDP Pharmacy File, ArcGIS Census Tract File. NACDS Economics Department.

<sup>5</sup> Avalere. Exploring Pharmacists' Role in a Changing Healthcare Environment. May 21, 2014, available at: <https://avalere.com/insights/exploring-pharmacists-role-in-a-changing-healthcare-environment>

**The Honorable Greg Walden, Ranking Member, U.S. House Committee on Energy and  
Commerce**