



Fairview



May 6, 2022

Chair Liebling, Chair Utke and Members of the Health and Human Services Omnibus Conference Committee:

On behalf of pharmacies across the state and thousands of Minnesota patients served through medication delivery, we write in opposition to the House changes relating to temperature control for prescription delivery through a common carrier.

We are opposed to the changes passed in the House but not heard in the Senate based on the following:

- Current Minnesota law and Board of Pharmacy procedures already require the integrity of the delivery process and compliance with a manufactures' temperature requirements, including the development of written policies and procedures consistent with United State Pharmacopeia standards and available to the Minnesota Board of Pharmacy.
- Pharmacies serving Minnesotans are already motivated by patient health and safety to ensure medication delivery is done properly and within the requirements of the manufacturer.
- As drafted, the House language would impact many pharmacies and have the unintended consequence of disrupting delivery to patients who are unable to make a trip to the pharmacy or those who value the convenience of delivery. This would limit patient access to their medications and/or increase patient costs.
- Solutions such as temperature monitoring tags are largely unproven. According to the Minnesota Board of Pharmacy report to the Legislature "currently there are no published studies assessing the number of false-positive or false-negative readings when included in the packaging and shipping of medications. Therefore, this study was not able to determine the reliability of using temperature indicator tags".
- Reimbursement for costs of dispensing medications in Minnesota currently does not include the expenses associated with deploying devices required in the House language, thus further challenging and threatening small independent pharmacies. With Minnesota seeing over 30% of independent pharmacies closing in the last decade, the requirement for temperature control devices could impede patient access with additional pharmacy closures.

- No other state in the country has passed language mandating temperature control devices.

Because of these reasons and with an emphasis on the potential impact on Minnesota's patients and the pharmacies that serve them, we ask that you not adopt the House language.

Sincerely,

Sarah K. Derr, PharmD, Executive Director
Minnesota Pharmacists Association

Tammy Bezdicek, PharmD, BCPS, FMSHP, Co-Chair
Minnesota Pharmacy Alliance

Michelle Aytay, RPh, CDE, Co-Chair
Minnesota Pharmacy Alliance

Lindsay Christensen, PharmD, Executive Director
Community Pharmacy Enhanced Service Network of Minnesota

Garrett Schramm, PharmD, FCCP, President
Minnesota Society of Health-System Pharmacists

Jamie Pfuhl, President
Minnesota Grocers Association

Bruce Nustad, President
Minnesota Retailers Association

Ann Byre, PharmD, Vice President, Pharmacy Services
Allina Health

Jessica Astrup Ehret, PharmD, Owner
Astrup Companies/Sterling Pharmacy/Sterling Long Term Care/Sterling Specialty

Jason Miller, Pharm.D., Pharmacy Clinical Program Manager
Coborn's

John Pastor, PharmD, System Vice President, Pharmacy
Fairview Health Services

Michael Schwartzwald, R.Ph., President
Black Forest Pharmacy Services, LTD and its subsidiaries

Lance Oyen, PharmD, MBA, Chief Pharmacy Officer, Department of Pharmacy
Mayo Clinic

Senell J. Jaster, General Counsel, Compliance Officer and VP of Human Resources
Thrifty White Pharmacy

Kimberly Walz, Regional Director, State & Local Government Relations
Walgreens