February 8, 2010

Department of Defense
Federal Docket Management System Office
1160 Defense Pentagon
Washington, DC 20301-1160

RE: DoD-2009-HA-0151; 32 CFR Part 199 Civilian Health and Medical Program of the Uniformed Services (CHAMPUS)/TRICARE: Inclusion of Retail Network Pharmacies as Authorized TRICARE Providers for the Administration of TRICARE Covered Vaccines; Interim Final Rule

Dear Sir or Madam:

Thank you for the opportunity to comment on the CHAMPUS/TRICARE inclusion of retail network pharmacies at authorized TRICARE providers for the administration of TRICARE covered vaccines. The National Community Pharmacists Association (NCPA) represents America’s community pharmacists, including the owners of more than 22,700 independent community pharmacies, pharmacy franchises, and chains. Together they represent an $88 billion health-care marketplace, employ over 65,000 pharmacists, and dispense over 40% of all retail prescriptions.

Community Pharmacists Serve Vital Role as Immunizers

NCPA applauds the Department of Defense’s issuance of an interim final rule in December 2009 allowing a TRICARE retail network pharmacy to be an authorized provider for the administration of the H1N1 vaccine, seasonal influenza vaccine, and pneumococcal vaccine in the retail pharmacy setting. The rule brings the program in line with other insurers that have covered pharmacist-administered vaccinations for years. NCPA strongly supports the Pentagon’s decision to cover the provision of these critical vaccines at community pharmacies. This is truly a case where everyone wins. The 9.5 million TRICARE-eligible patients gain a convenient new vaccination option and taxpayers and plan administrators will save money when vaccines are administered at pharmacies instead of costlier doctors’ offices or hospitals.

As of June 2009, pharmacists may now provide vaccinations in all 50 states. So far over 88,000 pharmacists are certified to immunize. In addition to initial training, pharmacists must demonstrate continued competence. The administration of these immunizations is often in collaboration with a physician under a protocol agreement that often include procedures for...
emergency situations, documentation, and recordkeeping. Each year pharmacists are providing millions of vaccines to patients, making them a valuable public health resource. Pharmacist-provided immunizations allow physicians, nurses, and other healthcare providers to engage in patient care activities unique to their practice area.

With 90% of Americans living within five miles of a community pharmacy, pharmacists are easily accessible as vaccine providers, advocates, and educators. Pharmacists are among the most trusted healthcare professionals and have a positive impact on increasing immunization rates by identifying high-risk individuals. Patients often seek advice from their community pharmacist on various health issues, allowing pharmacists the opportunity to encourage immunization.

**NCPA strongly recommends TRICARE cover additional vaccines through community pharmacies**

TRICARE coverage of H1N1 influenza, seasonal influenza, and pneumococcal vaccines through the retail network of pharmacies is a step in the right direction but NCPA urges that additional vaccines be covered. Depending on state law, there are a multitude of other vaccines that pharmacists can provide to help increase the number of vaccinated patients and decrease the incident of vaccine-preventable disease. NCPA encourages the Department of Defense cover all vaccines at network retail pharmacies that are TRICARE eligible vaccines and those that are included on the Centers for Disease Control and Prevention (CDC) adult immunization schedule. This includes vaccines such as Hepatitis A&B, Herpes Zoster, Human Papillomavirus, Meningitis, Measles, Mumps and Rubella (MMR), Tetanus, and Varicella. This is not an exhaustive list and given the nature of the TRICARE population NCPA also urges consideration of expansion to any vaccines recommended for travel.

**Additional Considerations**

NCPA also hopes that TRICARE covered vaccines provided in retail network pharmacies will not require a referral from a physician, but would be open to any patient who wishes to be vaccinated. Community pharmacists are trusted sources of health information with ongoing relationships with their patients. Pharmacists can use these existing relationships to encourage their patients to be vaccinated to protect themselves and their loved ones. In keeping with the CDC immunization recommendations, pharmacists can help the entire health care team keep their patients on track with goals the whole team aims for. Requiring patients to get a referral for vaccines can increase cost and inconvenience for patients visiting multiple providers to coordinate care and increase recordkeeping requirements for physicians and pharmacists.

NCPA applauds DoD processing immunization claims through the pharmacy benefit, taking advantage of the electronic process for real-time claims adjudication. We encourage the Department to use one standard format for the processing of claims, as varying requirements for different vaccines could create difficulties related to claims administration.

NCPA appreciates the opportunity to comment on DoD-2009-HA-0151; *Inclusion of Retail Network Pharmacies as Authorized TRICARE Providers for the Administration of TRICARE*
Covered Vaccines. If you have any questions, please contact me at (703) 683-8200 or john.coster@ncpanet.org.

Sincerely,

John M. Coster

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