



7/30/2014

Washington State Pharmacy Quality Assurance Commission
111 Israel Road SE
Tumwater WA 98501

Dear Commissioner:

Rite Aid has reviewed the proposed changes and reviewed the comments submitted on the identified priority topic areas. Rite Aid's concerns are discussed below in greater detail.

Comments on Priority Area: Workload and Staffing Levels (sufficient personnel, quotas, workflow metrics, appropriate staffing to provide for patient counseling)

Rite Aid does track customer/patient complaints as well as compliments of our pharmacy teams. Customer/patient service is critical to assuring that our customers/patients are receiving the superior pharmacy services that they are entitled to have and have come to expect. Customer service feedback shows that customers want pharmacies to respect and value their time. Our pharmacies, based on our patient satisfaction surveys, are fulfilling a majority of waiting prescriptions within a short amount of time based on patient demand. Our patients are aware that we will accommodate their waiting prescriptions as a priority when requested.

Various metrics such as proper inventory levels, pharmacy support staff schedules completed by our pharmacy managers to match the business demand, the completion of required training, to name a few, are all in the best interest of our patients and their safety. Training employees allows for the delivery of exemplary patient services and maintains consistency and standards the patient expects at any Rite Aid. Pharmacy District Managers use various business metrics as an opportunity to identify and train employees to maintain the highest standards for the patient.

Our pharmacies receive forecasted pharmacy sales for each week with corresponding prescription counts. A viable business always looks to improve their sales performance, while patient safety remains the priority for our professionals. Rite Aid continues to train our pharmacists to understand their business and react to their patient's needs. In many cases, prescription volume can be impacted by pharmacies not providing good service, not maintaining an appropriate pharmacy inventory to serve all patients, not adhering to proper workflow and not assuring that patients are filling their prescriptions according to the

prescriber's directions through effective counseling. It is good business and in the best interest of patient safety to track pharmacy performance and as with all businesses, pharmacy business does have goals as well, which are not the same as quotas. While patient safety is absolutely our number 1 priority, what needs to be understood is that as with any business, if they don't make a profit, they don't stay in business. If pharmacies go out of business it limits access for the patients, could negatively impact their health and safety, as well as potentially disrupting long-term pharmacist-patient relationships.

Rite Aid supports and encourages our pharmacists to take meal time and rest breaks and has a long standing meal and break policy in place. However, Rite Aid is not supportive of mandating and placing restrictions on the timing of such breaks for professionals. A pharmacist is a healthcare provider and should have the latitude to determine when to take his/her breaks within the flow of patients and prescriptions encountered during the work day. Rite Aid asks that this allowance be clarified in the mle proposal so that the pharmacist can make this decision, as this has the potential to limit access to the pharmacist and pharmaceutical care in many stores that have only a single pharmacist on duty.

Rite Aid does not mandate pharmacist schedules, but permits them as professionals to develop their schedules with a partner(s). These professionals are given the authority to manage a schedule to accommodate peak periods in their weekly business to accommodate the prescription volume. Pharmacists can work split shift days, as Rite Aid encourages, but in many cases choose to work longer days, allowing for them to have more days off per week to better accommodate their work/home life balance, such as childcare, participation in activities, spouse/partner work schedule, etc..

In addition to adequate staffing scheduled to meet the business needs, today's chain pharmacists have many technology tools at their disposal to assist with the workload, such as e-prescribing, patient messaging, automated refill programs, refill synchronization, voice response phone systems, and automation. Embracing and utilizing today's technology and scheduling and training ancillary staff will most certainly allow the pharmacist to do the professional aspects of his/her job, such as resolving DUR issues with the prescriber and patient counseling.

Comments on Priority Area: Prescription Transfers

Rite Aid promotes the well-established fact that patients having all of their prescriptions filled at one pharmacy assures that the quality of the Drug Utilization Reviews using overall prescription history is optimized and leads to better patient care, adherence, and favorable healthcare outcomes. We do not encourage patients continuously transferring prescriptions to take advantage of transfer coupons. However, in some cases, a transfer prescription coupon is offered to patients that would prefer to change pharmacies which can potentially improve their overall prescription/healthcare experience.

Comments on Priority Area: Appropriate time, space and privacy for clinical pharmacy functions (including immunizations)

Rite Aid believes that it is important to allow our pharmacists to expand their professional pharmacy services beyond prescription dispensing. We encourage our pharmacists to practice to the full extent of their training and licensure. We have invested in training all of our pharmacists to perform immunizations as permitted by state regulations. We continue to train our pharmacists to be able to conduct Medication Therapy Management services to assure patients understand their medication regimen and the importance of staying compliant. These professional services are essential for the future of pharmacy and our pharmacists. It is critical that our pharmacists understand their expanded roles to improve healthcare within their community. Rite Aid provides the training and tools to properly blend dispensing and professional services within each pharmacist's work day. Not all pharmacies are able to have a private separate room to perform these services, but we do provide semi-private areas and ensure our patient's privacy in all aspects of our business. Limiting patient's access to these critical clinical services will have a detrimental impact on patient health and safety.

We thank the Pharmacy Quality Assurance Commission and Pharmacy Business Practices Committee for the opportunity to comment on these proposals.

Thank you for your consideration.

Respectfully submitted,



Amanda Glover, PharmD
Director, Pharmacy Operations
Rite Aid

July 31,2014

Mr. Dan Rubin, Chair
Pharmacy Business Practices Committee
Washington Pharmacy Quality Assurance Commission
310 Israel Rd. S.E.
Tumwater, WA 98501

To Members of the Pharmacy Business Practices Committee:

On behalf of the members of the National Association of Chain Drug Stores (NACDS) operating in Washington, I would like to encourage the Committee to utilize the expertise of stakeholders as they work through the rules being considered and discussed.

NACDS members in Washington include: Albertsons, Bartell Drug Company, Costco, Genoa Healthcare, Good Neighbor Pharmacies, Hagen Food & Pharmacy, Health Mart, Hi-School Pharmacy Services, Medline Shoppe, Pharmaca Integrative Pharmacy, Rite Aid Corporation, Rosauers Supermarkets, Safeway, Sears Holding Corporation (Kmart), Shopko Corporation, Target Corporation, Walgreen Company and Wai-Mart Stores, Inc. These 18 companies operate 790 stores in Washington, employ over 101,000 full and part-time employees, and pay over \$811 million in state taxes.

The members of NACDS respectfully request the subcommittee open the meeting process up to stakeholders during the discussion process. This allows for interested parties to attend these meetings and participate in the discussions and the process also allowing the commission members to hear from those who would have to implement the eventual rules.

Historically the then Board included stakeholders on the sub-committees to allow for open discussion and subsequently collaborative rule making.

In setting up a stakeholder work group discussion process you could effectively utilize the issue clusters already identified to set the agenda for assessing current rules to determine the necessity for, or language of any changes that may be necessary.

We believe the initial three priority areas taken one at a time under the stakeholder/committee process will assist in facilitating discussion and eventually decision making as they will be based on current practices and if need be, bring rules into line with those practices.

NACDS members look forward to working with the Commission and the Pharmacy Business Practices Committee.

Sincerely,

Lis Houchen
NW Regional Director
State Government Affairs
lhouchen@nacds.org

W!iPA

WASHINGTON STATE PHARMACY ASSOCIATION

August 1, 2014

Dan Rubin, MPP, Public Member, Chair
Pharmacy Business Practices Committee
Washington State Pharmacy Quality Assurance Commission

RE: Pharmacy Business Practice Comments

Mr. Rubin,

On behalf of the members of the Washington State Pharmacy Association and the Washington State Pharmacy legislative and Regulatory Affairs Council, we appreciate the opportunity to offer comment on topics to be considered by your Pharmacy Business Practices Committee.

Pharmacy Business Practice is a vast subject that could include numerous topics. In order for your committee to address topics that are within the purview of the PQAC, it is very important that you focus specifically on issues within the scope, mission and mandate of PQAC concerning public health and safety. While our members recognize that fair labor practices are very important and an area of concern, most labor practices are governed by state and federal labor laws, which are regulated by other state agencies. We request that PQAC conduct an analysis of applicable labor laws and rules prior to rulemaking in order to avoid making conflicting rules and confusion. That being said, there are topics that are within the scope of PQAC that could be considered and the WSPA is committed to collaboratively contributing to rulemaking process to ensure pharmacy business practices do not harm patients.

The mission of the Washington State Pharmacy Quality Assurance Commission is to promote public health and safety by establishing the highest standards in the practice of pharmacy and to advocate for patient safety through effective communication with the public, profession, Department of Health, governor and the legislature.

The mandate of the Pharmacy Commission is to protect the public's health and safety and to promote the welfare of the state by regulating the competency and quality of professional healthcare providers under its jurisdiction.

While we respect the work done to identify the three priority topics, we believe the task of identifying the appropriate topics is an extremely important undertaking that should be evidence based. We strongly urge PQAC to complete an analysis of public health and safety complaints and documented patient harm in order to identify the most urgent public health and safety issues. We feel this analysis of critical importance to define the problem. Such an analysis should clearly define the topics that need to be addressed.

We appreciate this opportunity to provide ideas on topics and respectfully ask the Committee to continue to work with stakeholders in a collaborative manner throughout the entire rule making process. As stated previously, this is a large subject that impacts all areas of healthcare. There are pharmacies in various practice settings including hospitals, infusion centers, clinics, long-term care facilities, as well as mail-order, specialty, and community pharmacies. Pharmacists and employers in all areas need to be engaged in this collaborative process to avoid any unintended ramifications from uniformed rulemaking.

Our healthcare system and the practice of pharmacy is in the midst of unprecedented change. Washington State is considered a national leader in the practice of pharmacy and national pharmacy coalitions are making great strides toward getting the pharmacists recognized as providers at a national level. We must acknowledge and respect the innovative steps Washington pharmacists have made over the years. We do not want to stifle Innovation during a crucial time of change. Please consider the end goal of ensuring public health and safety while allowing pharmacy leaders to keep moving the profession forward.

Thank you for your thoughtful consideration of our recommendation and requests. As always, I would be happy to be of assistance to you. If I can help in any way, please don't hesitate to ask.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Rochon', with a stylized flourish at the end.

Jeffrey J. Rochon, Pharm.D.
Chief Executive Officer
Washington State Pharmacy Association