



April 26, 2024

[Submitted electronically via: documentcontrol@dncfp.nv.gov]

Stacie Weeks JD, MPH
Administrator
Nevada Department of Health and Human Services
Division of Health Care Financing and Policy
1100 E. William Street
First Floor Conference Room
Carson City, Nevada 89701

Re: Notice of Public Meeting to Solicit Comments on Amendments to the State Plan for Medicaid Services

Dear Administrator Weeks:

The Nevada Pharmacy Alliance (NPA) and the American Pharmacists Association (APhA) write in support of The State of Nevada, Department of Health and Human Services (DHHS), Division of Health Care Financing and Policy's (DHCFP's) intention to amend the state plan to update the rate for pharmacists' services to be reimbursed in parity with physician assistants for certain services. We appreciate DHCFP filing this SPA per our organization's joint comments submitted on October 31, 2023.¹

NRS 422.27235 requires reimbursement by the state Medicaid program of certain services provided by a pharmacist "at a rate equal to the rate of reimbursement provided to a physician, physician assistant or advanced practice registered nurse for similar services." Currently, according to Attachment 4.19-B Page 1e² of the Nevada Medicaid State Plan, pharmacists are reimbursed at 63% "of the Medicare non-facility rate" for "Evaluation and Management Codes 99201 – 99499". The changes DHCFP have proposed will pay pharmacists in parity with physician assistants for services intended to test for, prevent or treat human immunodeficiency virus (HIV) or hepatitis C. We believe that these changes will allow for more pharmacists to provide these essential services to Nevadans. This is vital given the over 11,000 patients living with HIV³ and over 21,000 patients living with hepatitis C⁴ in Nevada.

Thank you again for the submission of this SPA and for your consideration of these supportive comments. If you have any questions or require additional information, please don't hesitate to contact Ken Kunke, PharmD, NPA Executive Secretary by email at info@nevadapharmacyalliance.com, and E. Michael Murphy, PharmD, MBA, APhA Advisor for State Government Affairs by email at mmurphy@aphanet.org.

¹ https://www.pharmacist.com/DNNGlobalStorageRedirector.ashx?egsfid=e9KV_b4qkNE%3d

² <https://dhcfnv.gov/uploadedFiles/dhcfpnvgov/content/Resources/AdminSupport/Manuals/MSP/Sec4/5-4.19AttachBPayforMedCare.pdf>

³ <https://aidsvu.org/local-data/united-states/west/nevada/>

⁴ <https://hepvu.org/local-data/nevada/>

Sincerely,

Ken Kunke, PharmD
Executive Secretary
Nevada Pharmacy Alliance

Michael Baxter
Vice President, Federal and State Government Affairs
American Pharmacists Association

About NPA: NPA was created to address the need in Nevada to have an association that focused on the greater good of the pharmacy profession. To make sure that pharmacy professionals are supported so that they are able to take care of their patients. NPA is committed to connecting, educating, and advocating for the profession of pharmacy to optimize patient care and public health.

About APhA: APhA is the largest association of pharmacists in the United States advancing the entire pharmacy profession. APhA represents pharmacists in all practice settings, including community pharmacies, hospitals, long-term care facilities, specialty pharmacies, community health centers, physician offices, ambulatory clinics, managed care organizations, hospice settings, and government facilities. Our members strive to improve medication use, advance patient care and enhance public health. In Nevada, with 2,510 licensed pharmacists and 4,450 pharmacy technicians, APhA represents the pharmacists and students that practice in numerous settings and provide care to many of your constituents. As the voice of pharmacy, APhA leads the profession and equips members for their role as the medication expert in team-based, patient-centered care. APhA inspires, innovates, and creates opportunities for members and pharmacists worldwide to optimize medication use and health for all.