

November 20, 2007

Rhonda Lesofski  
Office of Legal Affairs  
Dept. of Public Health and Human Services  
P.O. Box 4210  
Helena Mt 50604-4210

Re: Montana Medicaid Hearing #1105

Dear Rhonda,

On behalf of the Montana Pharmacy Association we want to submit these additional comments in regards to the dispensing reimbursement hearing held on November 14.

Foremost, we want to re-emphasize to the department that pharmacies providing services to assisted care facilities provide services in excess of those of an ambulatory pharmacy. Assisted care facilities, which may include nursing homes, group homes, or hospice settings, serve the populations with the greatest need. Usually these patients are not able to take care of themselves. Pharmaceutical services include delivery of medications to the home, specialized packaging, and constant review of the drug regime, because the patients typically have myriad medical problems requiring multiple prescriptions. These prescriptions can and will change often, as do the medical conditions.

Additionally, under Medicare Part D, many Pharmacy Benefit Managers increase the dispensing fee paid to pharmacies that serve assisted care facilities, to cover the additional expense of serving those patients. This is done electronically by adding a code which signifies that the patient is living in an extended care facility.

For these reasons the Montana Pharmacy Association would re-emphasize our position that current dispensing fee be increased to \$1.00 per each prescription. Montana Medicaid now pays \$0.75 for each prescription requiring unit dose packaging. In serving assisted care facilities, pharmaceutical services go far beyond just special packaging. These services keep the assisted care patients out of hospitals by ensuring that their care-givers make no mistakes with their drug regimen. Given the additional services that these vulnerable patients require an additional dispensing fee is justified.

Thank you for your consideration of our comments.

Sincerely,

James P. Seifert, President  
Montana Pharmacy Association