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Owner, Professional Pharmacy
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October 7, 2020

Commissioner Kathleen Birrane
Maryland Insurance Administration
200 St. Paul Place, Suite 2700
Baltimore, MD. 21202

Re: Comments on Maryland Insurance Administration Proposed Pharmacy Services Administrative Organization (“PSAO”) regulations (the “Regulations”)

The purpose of this letter is to express my concern with the Maryland Pharmacy Service Administrative Organization law (“PSAO Law”) and the Regulations. While I appreciate the Commissioner’s attempt to provide more transparency PBM practices, the recent PSAO legislation fails to accurately distinguish the role my PSAO provides and may lead to unintended consequences for Maryland pharmacies and the patient we serve.

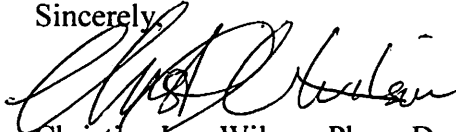
As a pharmacy owner in Rosedale, I firmly believe the Regulation will have an adverse and negative impact on pharmacists and independent pharmacies in Maryland. As you know, pharmacists and pharmacies play a critical role in the healthcare system. Independent pharmacies rely on our relationship with PSAOs to assist us in finding solutions to the challenges we face in the current Pharmacy Benefit Mangers (PBMs) marketplace. The PSAO Law and the Regulations seems to devalue the significance and importance of the pharmacy and PSAO relationship and fails to distinguish the roles of a PSAO versus the PBMs to the pharmacy.

PSAOs play a significant role in ensuring that a pharmacist time is spent providing services and caring for our patients. PSAO’s assist pharmacies by cutting through the complexity of payer/PBM contracts and make it easier to understand such contracts while freeing up time for pharmacies to focus on patient support. PSAO also allows pharmacies and pharmacist to stay up to date on industry changes and payer performance evolution in the market, giving pharmacies more time to focus on patient adherence and outcomes leading to improved health results.

Moreover, the Regulations will place an undue and unnecessary burden, not only on the PSAO, but also the pharmacies and pharmacists those PSAO’s serve and the patients we serve. The cost of compliance with the PSAO law and the Regulations as currently drafted might lead to PSAOs exiting the Maryland market, increase operating and administrative expenses and have an unintended consequence of lowering reimbursement for independent pharmacies. I choose to use a PSAO and pay a flat nominal monthly fee, so I don’t have to take on the task of contracting and other administrative services myself or hire additional staff.

It is inherently unfair to the pharmacy industry to legislate and treat PSAOs like PBMs or payers. Each of these organizations have distinct roles in the pharmacy relationship dynamic and it is critical that such distinctions are recognized and accounted for with respect to any legislative and regulatory efforts. Additionally, the Regulations as currently drafted may lead to increased cost and lower reimbursement to our Maryland independent pharmacies. Please feel free to reach out if you would like any additional input from a pharmacist and pharmacy owner perspective at either christine.leewilson@gmail.com or calling my pharmacy at 410-687-8113.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christine Lee-Wilson', written in a cursive style.

Christine Lee-Wilson, PharmD
Owner, Professional Pharmacy