

March 8, 2022

President Joseph R. Biden
The White House
1600 Pennsylvania Ave., NW
Washington, DC 20500

Dear President Biden:

We applaud the statement in your State of the Union address recognizing the opportunity to improve access to care by announcing that pharmacy locations will be test and treat locations for patients. However, only certain pharmacies are currently able to meet this goal until the Food and Drug Administration (FDA) modifies its Emergency Use Authorizations (EUAs) for oral antivirals and removes the limitation preventing pharmacists from ordering these medications.

Many states license pharmacists to order medications, either independently or in collaboration with a physician. In September, Secretary Becerra took an important step to expand patient access by authorizing pharmacists in all 50 states to order oral treatments for COVID-19. Unfortunately, the FDA's limitation undermines the intent of your announcement and patient access to pharmacies as a one-stop shop for COVID-19 testing and treatment with antivirals. This limitation is also inconsistent with FDA's normally provider-neutral prescriber directives in approval and EUA decisions.

Pharmacists are clinically trained medication experts and are the primary healthcare professionals responsible for ensuring safe medication use, including identifying and mitigating drug interactions associated with oral antiviral medications for COVID-19. While we are working with FDA and providing them with information, data, and recommendations to give them comfort and confidence that pharmacists can appropriately order these medications, to meet the goals of your announcement and widely reach patients in need, FDA must immediately lift these limitations.

Despite your statement during the State of the Union, Americans who test positive at a pharmacy will only be able to access time-sensitive oral antivirals, on the spot, from a limited number of pharmacies with in-house access to non-pharmacist prescribers, primarily in metropolitan areas. Unfortunately, rural and underserved communities are less likely to benefit from your test to treat approach because of this limitation.

Thank you again for recognizing the potential of pharmacists to improve patient access to COVID-19 treatments. Our patients are counting on the FDA to remove its EUA limitation preventing pharmacists from ordering oral antivirals, so that we can achieve the full potential of your test to treat initiative.

Sincerely,

Paul W. Abramowitz, Pharm.D., Sc.D. (Hon.),
FASHP
Chief Executive Officer
American Society of Health-System Pharmacists
(ASHP)

Joni Cover, JD
Acting Chief Executive Officer
Vice President of Strategic Initiatives
National Alliance of State Pharmacy Associations
(NASPA)

Lucinda Maine PhD, RPh
Executive Vice President and CEO
American Association of Colleges of Pharmacy
(AACCP)

Lemrey "Al" Carter, PharmD, MS, RPh
Executive Director/Secretary
National Association of Boards of Pharmacy (NABP)

Quentin Srnka, PharmD, MBA
Executive Vice President / CEO
American College of Apothecaries (ACA)

B. Douglas Hoey RPh, MBA
CEO
National Community Pharmacists Association
(NCPA)

Margo Farber, Pharm.D.
Executive Director
Society of Infectious Diseases Pharmacists (SIDP)

Susan A. Cantrell, RPh, CAE
Chief Executive Officer
AMCP (Academy of Managed Care Pharmacy)

Chad Worz, PharmD, BCGP
Chief Executive
American Society of Consultant Pharmacists (ASCP)

Brenda K. Schimenti
Executive Director
College of Psychiatric and Neurologic Pharmacists
(CPNP)

Ryan C. Marable, PharmD
President
National Pharmaceutical Association (NPhA)

Anne Krolikowski, CAE
Executive Director
Hematology/Oncology Pharmacy Association
(HOPA)

Michael S. Maddux, Pharm.D., FCCP
Executive Director
American College of Clinical Pharmacy (ACCP)

Scott J. Knoer, MS, PharmD, FASHP
Executive Vice President & Chief Executive Officer
American Pharmacists Association (APhA)