



June 28, 2022

[Submitted electronically via: [suzanne.bierman@dhecp.nv.gov](mailto:suzanne.bierman@dhecp.nv.gov)]

Suzanne Bierman, J.D., M.P.H.  
Administrator  
Nevada Department of Health and Human Services  
Division of Health Care Financing and Policy  
1100 East William Street, Suite 101  
Carson City, NV 89701

**Re: Notice of Meeting to Solicit Public Comments and Intent to Act Upon Amendments to The Nevada Medicaid Services Manual (MSM)**

Dear Administrator Bierman:

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 add pharmacists as billable providers for hormonal contraceptive services and services that prevent the acquisition of human immunodeficiency virus (HIV). NPA and APhA are additionally supportive of DHCFP's proposal to add pharmacists' services as billable encounters in federally qualified health centers (FQHCs) and rural health clinics (RHCs).

The Nevada Pharmacy Alliance was created to focus on the greater good of the pharmacy profession. NPA represents pharmacists, pharmacy technicians, and pharmacy interns in all practice setting in Nevada. We strive to make sure that pharmacy professionals are supported so that they can take care of their patients. We are committed to connecting, educating, and advocating for the profession of pharmacy to optimize patient care and public health.

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, APhA represents 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.

The proposed amendments to the Nevada State Plan by DHCFP are aligned with the intent of Assembly Bill 190 and Senate Bill 325 which were passed during the 81st Legislative Session (2021). Both bills were signed into law with the intent that pharmacists in all outpatient care settings, including, but not limited to FQHCs and RHCs would be reimbursed for hormonal contraceptive and HIV prevention services under the medical benefit and that pharmacists would be able to bill comparable current procedural terminology (CPT) billing codes as other health care professionals providing the service. We greatly appreciate the work of the Division in implementing this legislation as intended to ensure the most Nevadans have access to the valuable care offered by pharmacists. We additionally reaffirm our recommendation that pharmacists be able to bill at a minimum CPT codes 86701, 87389, 87806, 88202, 99203, 99204, 99205, 99211, 99212, 99213, 99214, 99215, 99401, 99402, 99403, 99404, 99411, 99412, and G0433. These codes are aligned with the implementation other states Medicaid departments have taken in the past year, for example Colorado.<sup>1</sup>

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<sup>1</sup> Pharmacist Services Billing Manual: Other Covered Pharmacist Services. *Colorado Department of Health Care Policy & Financing*. Available at <https://hcpf.colorado.gov/pharm-serv#payCovServ>.

We are confident that with the approval of the proposed amendments to the State Plan, more Nevadans will have greater access to hormonal contraceptive services and HIV prevention services provided by pharmacists. NPA and APhA would like to express their sincere gratitude to the team at DHCFP for their commitment to collaboration and hard work throughout the process of implementing these pieces of legislation.

If you have any questions or require additional information, please don't hesitate to contact Ken Kunke, PharmD, NPA Executive Secretary by email at [kkunke@roseman.edu](mailto:kkunke@roseman.edu) and E. Michael Murphy, PharmD, MBA, APhA Advisor for State Government Affairs by email at [mmurphy@aphanet.org](mailto:mmurphy@aphanet.org).

Sincerely,



E. Michael Murphy, PharmD, MBA  
Advisor for State Government Affairs  
American Pharmacists Association



Ken Kunke, PharmD  
Executive Secretary  
Nevada Pharmacy Alliance

cc:

David Olsen, Chief, Pharmacy Services  
Kellie Ducker, Community Wellness Unit Manager  
Antonio Gudino-Vargas, Manager, Pharmacy Services