



October 20, 2022

Lindsey B. Courtney, J.D
7 Eagle Square
Concord, NH 03301
cc via email: lindsey.courtney@oplcnh.gov, OPLC-Rules@oplcnh.gov

Re: Ph 2600 Pharmacist Initiation and Dispensing of Nicotine Cessation

Dear Ms. Courtney,

We at VillageMD appreciate the New Hampshire Board of Pharmacy (NHBOP) for the opportunity to comment on the proposed Pharmacy Rules. We welcome the Board's regular language and policy updates reflecting changes in the practice of pharmacy.

VillageMD is a leading provider of healthcare for organizations moving toward a primary care-led, high-value clinical model. At VillageMD, we support and encourage team-based care centered around the patient, led by a primary care provider. We are excited about this regulation being utilized to enhance patient access to care and would like to propose an addition that can improve patient safety in New Hampshire.

Patients who have primary care providers are significantly more likely to fill more prescriptions and have a routine preventative visit in the past year.¹ Also, adults who have PCPs as their regular source of care experience lower mortality and incur reduced healthcare costs.² We appreciate NHBOP's insight to ensure the primary care provider is notified of nicotine cessation therapy but want to guarantee if the patient does not have a primary care provider, they are given resources to locate one. We propose the following addition:

Ph 2603.01 Pharmacist Requirements for Certification

(d) Provide notice to the primary care provider, when designated by the patient, of the administration of nicotine cessation therapy. **If the patient does not have a primary care provider, the pharmacist will supply a list of nearby providers or clinics that deliver primary care.**

Thank you for your time and consideration on this matter. I can be reached at ahill@villagemd.com or 864-415-2151 for any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Allison Hill', written over a horizontal line.

Allison Hill, PharmD
Manager, Pharmacy Affairs

¹ JAMA Intern Med. 2019;179(3):363-372. doi:10.1001/jamainternmed.2018.6716)

² Franks P, Fiscella K. Primary care physicians and specialists as personal physicians: health care expenditures and mortality experience. Journal of Family Practice. 1998;47(2):105-109