[Date], 2019

Mr. Harry Hendrix

Chief, Pharmacy Benefits Division

Department of Health Care Services

1500 Capitol Ave.

Sacramento, CA 95814

Dear Mr. Hendrix,

I am writing to express concern about the CPT codes assigned to implement California AB 1114.

While AB 1114 states that the rate of reimbursement for pharmacists providing the covered services shall be at 85 percent of the fee schedule for physician services under the Medi-Cal program, the assigned codes (99201, 99212, and 90471) do not allow sufficient time for pharmacists to meet the legal requirements for their providing naloxone, contraception, smoking cessation, travel medications, and immunizations services.

Please refer to clause (3) of subparagraph (A) of paragraph (10) of subdivision (a) of Section 4052 of the Business and Professions Code, Section 4052.01 of the Business and Professions Code, Section 4052.3 of the Business and Professions Code, Section 4052.8 of the Business and Professions Code, and Section 4052.9 of the Business and Professions Code for a complete list of requirements pharmacists must meet when providing services covered by AB 1114.

If pharmacists conform to the CPT codes you have assigned and submit claims correctly for time spent as ordering, referring, and prescribing providers of these services, they will be in conflict with the time and complexity standards that the codes are based off of in authorizing pharmacists to provide these services.

In effect, the assigned billing codes could preclude the legal implementation of services that AB 1114 was written to cover.

Please reconsider the intent of AB 1114 and allow enrolled provider pharmacists the same spectrum of CPT codes that any ORP reasonably would use to meet the detailed array of pharmacist requirements for providing naloxone, contraception, smoking cessation, travel medications, and immunizations services.

Sincerely,

[your signature]

[your name and California home, work, or school address]

 [Date], 2019

Mike Wofford, Pharm D.

Chief, Pharmacy Policy Branch, Pharmacy Benefits Division

Department of Health Care Services

1500 Capitol Ave.

Sacramento, CA 95814

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