

April 30, 2026

The Honorable Melissa Murray
Chair, Senate Committee on Health and Human Services
Via email to: SLegislation@rilegislature.gov

Re: Senate Bills 2851 and 2888, relating to business and professions/insurance
(pharmacists)

Dear Chairwoman Murray and Members of the Committee:

On behalf of Blue Cross & Blue Shield of Rhode Island (Blue Cross), I am writing to share reactions to these bills relating to pharmacists. We consolidated our comments on these bills into one letter as they share many common issues.

We support section one of SB 2888, relating to pharmacists prescribing and dispensing tobacco cessation drugs. However, we urge the committee to separate this targeted expansion from section two which would expose plans to open-ended financial liability, undermine network design and efforts to create collaborative coordinated care, and increase costs for employers and individuals. Likewise, Senate Bill 2851, generates concerns with both the overly-broad nature of the “test and treat” provisions in sections one and two, and a broad payment mandate duplicative of SB 2888.

Please know Blue Cross supports and funds pharmacists practicing “team-based care” within larger medical practices. However, when considering these bills, the Committee should be mindful of the varied nature of the practice of pharmacy:

- retail chain pharmacies,
- retail independent pharmacies,
- pharmacists embedded in primary care or other practice settings,
- pharmacists practicing independently (as envisioned by the rural health grant), and
- on-line pharmacies.

Given the interest in these bills, plus the legislation to loosen the standards for “collaborative pharmacy practices” in SB 2866, the state urgently needs to develop a clear strategy for the evolving role of pharmacists and pharmacies. Now is an opportune time to direct stakeholders to work on shared vision for the role of pharmacists and pharmacies in expanding access to high quality, affordable healthcare, and thoughtfully develop an appropriate legislative and/or regulatory structure. Such a plan would ensure integration with existing healthcare systems to maximize patient outcomes, access, safety, and cost.

Development of such a plan should involve the Department of Health, the Office of the Health Insurance Commissioner, the Executive Office of Health and Human Services, relevant practitioners and boards, and payers. Blue Cross would welcome the chance to participate in such a stakeholder dialogue. **However, absent that strategic and thoughtful planning, the “test and treat” and broad coverage for pharmacists’ services**

requirements risk fracturing the healthcare delivery system between primary care and pharmacy practices, creating patient safety risks, and adding costs.

The care delivered in medical practices differs from the care at pharmacies. Careful consideration should be given to patient care before adding to the authority and workload of pharmacists, especially at retail pharmacies. Pharmacists, many of whom are already over-extended, would be asked to have detailed, confidential conversations about a patient's medical history, discuss drug side effects and interactions, and administer medications, often in a semi-public space.

Collaboration among pharmacists and other practitioners is important for care and coverage. The collaborative practice agreement aligns care delivery with the pharmacist's area of specialization. Collaboration is important too from a coverage perspective, ensuring that patients and insurers are not billed for similar services – and conversely that another provider does not provide a service for which no payment is received (see the provision in each bill that carriers are not required to pay for duplicative services).

Again, a broad stakeholder conversation allows thoughtful consideration of health insurance administration questions relating to contracting and credentialing, application of benefits such as the collection of cost sharing, and network adequacy. For those reasons, Blue Cross supports the formation of a work group bringing together interested parties to further pharmacists' practice, and coverage of that care, in Rhode Island.

Sincerely,

Richard Glucksman,

Senior Government Relations Counsel