

March 23, 2020

The Honorable Michael R. Pence
Vice President of the United States
1600 Pennsylvania Avenue, NW
Washington, DC 20501

The Honorable Stephen Hahn, MD
Commissioner, Food and Drug Administration
5630 Fishers Lane, Rm 1061
Rockville, MD 20852

Re: Chloroquine and Hydroxychloroquine Supply

Dear Mr. Vice President and Commissioner Hahn,

As a follow-up to the meeting Vizion attended on March 11 at the White House, we wanted to offer some additional recommendations regarding an emerging threat to our nation's health care supply chain. We appreciate the numerous, swift actions the administration has taken to address this multi-faceted public health emergency but believe it is crucial that the White House Coronavirus Task Force take immediate steps to increase hospitals' access to chloroquine and hydroxychloroquine.

Vizion offers the below recommendations to better ensure patients who need chloroquine and hydroxychloroquine have access to these products. As you are both aware, there have been numerous reports across the press and clinical practitioner community about increased prescribing and dispensing of chloroquine and hydroxychloroquine in the retail setting for anticipatory/prophylaxis use against COVID-19. Given the current limited supply of these and other related products and the increasing number of COVID-19 patients being hospitalized for severe illness, the redirection of product away from the most critically ill patients as well as those who have been using these products for existing diseases (e.g. systemic lupus erythematosus, rheumatoid arthritis) is creating unnecessary hardship and the potential for even greater harm. As a result, Vizion is advocating for the two following steps to be taken to ensure supplies of potential COVID-19 treatments are prioritized for the patients who may need these drugs the most.

1. Retail dispensing of chloroquine and hydroxychloroquine (or other pharmaceuticals under investigation for COVID-19) should be limited to those patients who have been receiving treatment for labeled/well-established indications (e.g. lupus, rheumatoid arthritis). Strategies to address dispensing issues could include:
 - a. Retail pharmacies and their distributors partnering to identify and return any excess inventory in the retail channel back to the distributors so they can be ordered by health systems.
 - b. Pharmacy Benefit Managers (PBMs) and health plans requiring all new retail prescriptions for chloroquine and hydroxychloroquine to have a prior

- authorization to confirm it is being dispensed for approved/well-established indications or confirmed COVID-19 patients.
- c. State boards of pharmacy limiting prophylaxis use and imposing dispensing requirements for new retail scripts, specifically that the patient tested positive for COVID-19 and the length be 14 days with no refills.
 - d. Any new suppliers coming to market or donating large inventory of products should request that the distributors prioritize that product go to health systems.
2. All other distribution of hydroxychloroquine should be directed to the hospital/acute care environment where critically ill patients with COVID-19 are managed. The extent of evidence regarding the use of chloroquine and hydroxychloroquine is limited. Therefore, any information about its use in the critically ill patient population needs to be collected/aggregated to inform ongoing understanding about the safety and efficacy of these therapies. Hospitals and health systems are best positioned to support this need given their responsibility for managing the most critically ill patients and in investigational drug research for critical care therapies.

While new manufacturers are entering the market to increase availability of these two products, it will take time (i.e. weeks) for this new supply to reach hospitals. While our members wait for new product, we – and they – must optimize use of our current supply by trying to ensure that the patients who truly need these treatments have access to them.

Again, Vizient is deeply appreciative of the opportunity to support the administration's efforts to identify and employ mitigation activities during this trying time. Supply chain disruption is a significant challenge for health care providers, and we thank the administration for considering solutions to encourage research and patient access to treatment. We remain available to answer any questions related to these recommendations or to identify how we may help. Please do not hesitate to reach us by email at Byron.Job@vizientinc.com or Daniel.Kistner@vizientinc.com, or by phone at 972-830-0750 or 972-830-6969. We look forward to working with you to protect the health of our nation and we thank you for your leadership.

Respectfully,



Byron Jobe
President and CEO
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Daniel Kistner, PharmD
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Cc: Carmen Catizone, RPh, MS, DPh, Executive Director, National Association of Boards of Pharmacy