

December 5, 2018

Peter Mucchetti, Chief
Antitrust Division
Healthcare and Consumer Products
Dept. of Justice
450 Fifth St. NW Suite 4100
Washington, DC 20530

Dear Honorable Mucchetti:

I write in opposition to the proposed acquisition of Aetna by CVSCaremark Health . This merger would destroy competition in the Healthcare Industry, increasing costs for prescription medication, and reducing reimbursements or payments to pharmacies even more.

Patient access to quality healthcare in Arkansas and the U.S. is endangered due to Pharmacy Benefit Managers. As a pharmacist, I must speak for pharmacies, pharmacists, and our patients.

The decreased reimbursement rates to independent pharmacies will cause us to close our doors leading to the demise of independently owned pharmacies, remove access to pharmacy care in rural America, increase patient non-compliance, and increase healthcare costs.

PBMs, including CVS Caremark, continue to violate state laws by reimbursing below pharmacy cost. PBMs, including CVS Caremark, continue to ignore MAC appeals on reimbursements by not responding and not increasing payment to the pharmacy greater than cost of the medication. Paying on generic medications below cost and not responding to MAC appeals is a violation of Arkansas Act 900 of 2015 and Arkansas Deceptive Trade Practices Act.

It has been proven by the Arkansas Pharmacist Association that CVS Caremark and other PBMs Pay pharmacies a low amount and charge the insurance company a much higher amount.

Vertical integration of PBMs would destroy competition in community pharmacies resulting in higher costs and less access to patient care due to pharmacy closures, especially in rural America. PBMs should never own pharmacies and pharmacies should never own PBMs. This would be a conflict of interest.

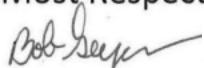
Also, PBMs' preferred pharmacy networks reduce patient choice by increasing the amount the patient pays at a non-preferred pharmacy.

PBMs, including CVS Caremark, continue to violate various laws and acts, especially in Arkansas.

CVS Caremark, also, requires patients to use mail-order, thereby preventing local pharmacies from filling a patient's prescription.

After your thorough review of the CVS-Aetna merger, I feel confident that you will agree that this merge should never happen.

Most Respectfully,



Bob Geyer, Pharm.D.


Pharmacist/Owner

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