

OIC Rules Coordinator

From: Jill McClellan <jmcclellan923@gmail.com>
Sent: Tuesday, December 9, 2025 8:52 AM
To: OIC Rules Coordinator
Subject: R2025-10 CR-102 Comment, Proposed Rulemaking filed November 4

External Email

Dear OIC Rules Coordinator:

My name is Jill McClellan, and I am a pharmacist, licensed and practicing pharmacy in Southwest Washington for the past 19 years. Throughout my career, I've had the opportunity to serve a diverse array of patients in a variety of practice settings, including long term care, community retail, and specialty pharmacy.

I am submitting testimony today on SB 5213 rulemaking. I applaud the OIC focus on patient medication access and affordability for Washingtonians. As an active member of their own healthcare team, patient choice allows advocacy and agency in the healthcare journey. I also encourage the committee to continue to recognize the unique ability of specialty pharmacy to support patients, and for the committee to maintain allowances for specialty medications to be filled primarily at specialty pharmacies.

Throughout my pharmacy experiences, I have seen the benefits of specialty pharmacy as a crucial member of the care team for the most vulnerable patients. Specialty pharmacies exist to work collaboratively with prescribers to provide accredited, comprehensive and timely care for patients with rare and complex diagnoses. Treatments for which are commonly administered by patients, in their own homes away from health care settings, and that utilize medications with special handling, storage and administration requirements.

Specialty pharmacies place focus on patient adherence to improve outcomes and reduce medication waste. Proactive patient outreach is a standard of care for accredited specialty pharmacies to aid patients with timely order scheduling and home delivery of their medication and all administration supplies, taking the mental burden off patients often facing the stress of mounting medical costs, frequent medical appointments and uncertainty about their diagnosis. Accredited specialty pharmacies are invested in the critical aspects of the safety and stability of the medications dispensed, such as cold storage, specific handling requirements and proprietary self-administration devices, providing patients with access to a clinical pharmacist to answer medication storage and administration questions 24 hours a day, seven days a week.

Specialty medications require targeted patient, drug, and disease specific consultations from a clinical pharmacist that has knowledge in the rare and complex conditions being treated. Accredited pharmacies require advanced training, certification and ongoing competency requirements to ensure their clinical teams are prepared to support patients through chart reviews, consultations, or on-demand

patient questions. Frequent chart reviews allow specialty pharmacists to identify side effects, treatment barriers, or non-adherence prior to a patient's discontinuation or treatment failure and communicate these with prescribers, working collaboratively to improve patient outcomes. My experience in retail pharmacy did not provide the opportunity or operational structure to dedicate the time and resources to this level of patient monitoring and care.

Without protected access to specialty pharmacy, patients are more likely to be served by traditional retail or mail order pharmacies that increasingly require patients to engage electronically or through AI, removing the human touch from patient care, and placing the burden of medication management back on patients and caregivers. Without proactive scheduling outreach and comprehensive clinical monitoring by trained and certified skilled specialty pharmacy personnel, patients are more likely to miss doses, stop therapy without medical advice, or suffer adverse events without symptom management, leading to poorer disease state management and driving up health care spending for both individuals and government funded programs.

Thank you for your consideration today. Again, I urge you to recognize the unique value of specialty pharmacy to citizens of Washington State.

Sincerely,

Jill McClellan, PharmD

(360)600-0663

jmcclellan923@gmail.com