



May 8, 2025

The Honorable Maura Healey
Governor of the Commonwealth of Massachusetts
24 Beacon St., Room 280
Massachusetts State House
Office of the Governor
Boston, Massachusetts 02133

The Honorable Michael Rodrigues
Chairman of Ways and Means Massachusetts
Senate
24 Beacon St., Rm 212
Massachusetts State House
Boston, Massachusetts 02133

The Honorable Aaron Michlewitz
Chairman of Ways and Means Massachusetts
House of Representatives
24 Beacon St., Rm 243
Massachusetts State House
Boston, Massachusetts 02133

RE: Opposition to Section 78 – Pharmacy Assessment in FY26 Budget

Dear Governor Healey, Chairman Rodrigues, and Chairman Michlewicz,

On behalf of the Alliance for Pharmacy Compounding, the National Community Pharmacists Association, and the compounding pharmacies we represent in Massachusetts and across the country, I write to respectfully express our strong opposition to the pharmacy assessment proposed in Section 78 of the Commonwealth's Fiscal Year 2026 budget.

This assessment amounts to a new tax on pharmacies—implemented outside of a formal rulemaking process and without the transparent input of the pharmacy community. It creates yet another financial burden on independent and compounding pharmacies at a time when many are already struggling to stay afloat amid unsustainable reimbursement rates from pharmacy benefit managers (PBMs) and rising operational costs.

Massachusetts cannot afford to lose more pharmacies. Yet independent pharmacies are closing at an alarming rate, and this proposal would only hasten that trend. For compounding pharmacies in particular, many of which provide critical medications that are unavailable elsewhere, this assessment could make it economically impossible to continue serving vulnerable patient populations.

We urge your administration to reconsider this provision. Section 78 threatens to undermine access to pharmacy care across the Commonwealth without clear justification or public vetting. We strongly support sound health policy, but we believe new financial mandates on healthcare

providers should be developed transparently and with stakeholder engagement—not inserted into the budget process without proper notice and comment.

We would welcome the opportunity to work with your administration, the legislature, and other stakeholders to identify fiscally responsible approaches that do not threaten the viability of independent pharmacies or the continuity of care for patients who rely on compounded medications.

Thank you for your consideration of our concerns.

Sincerely,



Scott Brunner, CAE
Chief Executive Officer
The Alliance for Pharmacy Compounding



Joel Kurzman
Director, State Government Affairs
National Community Pharmacists Association

The Alliance for Pharmacy Compounding is the voice for pharmacy compounding, representing more than 600 compounding small businesses – including compounding pharmacists and technicians in both 503A and 503B settings – as well as prescribers, educators, researchers, and suppliers. Many of our members are located in and serve human and animal patients in the state of Massachusetts.

The National Community Pharmacists Association (NCPA) represents America's community pharmacists, including 18,900 independent community pharmacies. Together, our members employ 205,000 individuals and provide an expanding set of healthcare services to millions of patients every day. Our members are small business owners who are among America's most accessible healthcare providers.