



October 6, 2023

**Senator Chuck Schumer**

Senate Majority Leader  
Hart Senate Office Building SH-322  
Washington, DC 20510

**Senator Mitch McConnell**

Senate Minority Leader  
Russell Senate Office Building SR-317  
Washington, DC 20510

Re: Opposition to Site Neutrality Provisions.

Dear Senators Schumer and McConnell:

We oppose site neutrality provisions that would reduce reimbursement for medication administration services in hospital outpatient departments. Such legislation inappropriately equates care provided in these hospital clinics with less complex care provided at freestanding sites. This care is not equivalent. Hospitals are required to take many additional measures to ensure safe preparation and administration of medications and guarantee care coordination for their patients (see attached chart).

Site neutral payment would ignore the extensive requirements hospitals meet to protect patients that free-standing sites do not, like having a clean room with positive air pressure to prevent microbial contamination, and ensuring drug preparation is supervised by a licensed pharmacist.

We ask that you oppose this legislation, and its inclusion in any legislative package, because it fails to take into account the costs of safely providing medication administration services to the complex patients hospitals serve.

We look forward to working with you to ensure Americans have access to quality care in hospitals and their outpatient clinics. If you have questions, please contact Frank Kolb at [fkolb@ashp.org](mailto:fkolb@ashp.org).

Sincerely,

American Society of Health-System Pharmacists  
Alabama Society of Health-System Pharmacists  
Alaska Pharmacists Association  
Allegheny Health Network  
Allina Health  
Arkansas Association of Health-System Pharmacists  
Ascension  
Avera  
Baptist Health South Florida

Baptist Memorial Health Care Corporation  
Baystate Health  
Beth Israel Lahey Health  
California Society of Health System Pharmacists  
Cleveland Clinic  
Colegio de Farmaceuticos de Puerto Rico  
Colorado Pharmacists Society  
CommonSpirit Health  
Connecticut Society of Health-System Pharmacists

## Opposition to Site Neutrality Provisions

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DEACONESS HEALTH SYSTEM  
Delaware Society of Health System Pharmacists  
ECU Health  
Fairview Health Services  
Florida Society of Health System Pharmacists  
Geisinger  
Georgia Society of Health-System Pharmacists  
Hackensack Meridian Health  
Harris Health System  
Hennepin Health Care  
Illinois Council of Health-System Pharmacists  
Inova Health System  
Intermountain Health  
Iowa Pharmacy Association  
Kansas Council of Health-System Pharmacy  
Kentucky Society of Health-System Pharmacists  
Lee Health  
Louisiana Society of Health-System Pharmacists  
MaineHealth  
Maryland Society of Health System Pharmacy  
Massachusetts Society of Health System  
Pharmacists  
Methodist LeBonheur Healthcare  
Michigan Society of Health System Pharmacists  
Minnesota Society of Health System Pharmacists  
Mississippi Society of Health-System Pharmacists  
Moffitt Cancer Center  
Montana Pharmacy Association  
MultiCare Health System

New Jersey Society of Health System Pharmacists  
New Mexico Society of Health-System Pharmacists  
Norton Healthcare, Inc.  
Nevada Society of Health-System Pharmacists  
Ohio Society of Health System Pharmacy  
Oregon Society of Health-System Pharmacists  
OSF HealthCare  
Pennsylvania Society of Health-System Pharmacists  
Providence  
Renown Health  
Rhode Island Society of Health System Pharmacists  
Riverside Health System  
Saint Luke's Health System  
Sharp HealthCare  
South Carolina Society of Health System  
Pharmacists  
South Dakota Society of Health-System Pharmacists  
SSM Health  
Sutter Health  
Tennessee Pharmacists Association  
The Ohio State University Wexner Medical Center  
UCHealth  
University of Arkansas for Medical Sciences  
University of Chicago  
University of Michigan Health  
University of Pittsburgh Medical Center (UPMC)  
Health System  
Virginia Society of Health-System Pharmacists  
WVU Health System

# REJECT SITE-NEUTRAL PAYMENT FOR LOWER STANDARDS OF INFUSION CARE



Infusion sites do not provide equivalent care. Hospital payment rates must be sufficient to support the higher standard of care that Centers for Medicare & Medicaid Services and other regulators require hospitals to meet for drug administration.

Site-neutral payment should apply only to infusion sites that meet the same rigorous standards for safe drug preparation, safe administration, care coordination, and oversight requirements as hospitals do.

REQUIREMENTS		HOSPITAL	PHYSICIAN OFFICE	FREE-STANDING SITE
SAFE PREPARATION	Clean room with positive air pressure to prevent microbial contamination	✓	✗	✗
	Environmental sampling to ensure sterile conditions	✓	✗	✗
	Drug preparation supervised by a licensed pharmacist	✓	✗	✗
	Employee protections from exposure to hazardous drugs	✓	✗	✗
	Drug Supply Chain Security Act rules prevent use of counterfeit or mishandled drugs	✓	✗	✗
SAFE ADMINISTRATION	Drug barcoding and EHR integration reduce administration errors	✓	✗	✗
	Hospital pharmacist confirms safe dosing and checks for drug-drug interactions	✓	✗	✗
	On-site physician for prompt response to adverse reactions	✓	✓	✗
CARE COORDINATION	On-site pharmacy prevents delays accessing medication	✓	✗	✗
	On-site pharmacy can modify dosing on day of infusion based on therapeutic needs	✓	✗	✗
	Provides care for the most complex patients	✓	✗	✗
	Provides access to care 24 hours per day	✓	✗	✗
	Provides care to uninsured and underinsured patients	✓	✗	✗
SAFETY OVERSIGHT	Food and Drug Administration, state boards of pharmacy, U.S. Pharmacopeia, and The Joint Commission	✓	✗	✗