

Massachusetts Chain Pharmacy Council

Big Y ♦ Hannaford Brothers ♦ Genoa Healthcare ♦ Price Chopper
Shaw's ♦ Stop & Shop ♦ Walgreens ♦ Wal-Mart ♦ Wegmans

March 20, 2026

Susan M. Flanagan – Cahill
Deputy General Counsel
Health Policy Commission
50 Milk Street, 8th Floor
Boston, MA 02109

Re: 958 CMR 6.00 – Registration of Provider Organizations

Dear Counsel Flanagan – Cahill:

I am writing on behalf of the members of the Massachusetts Chain Pharmacy Council to request clarification to the language contained in Section 6:03 (1) that addresses the level of Net Patient Service Revenue and Patient Panels benchmarks that if met will require the organization to comply with the provider registration requirements.

Each of the chain pharmacies that operate in Massachusetts also operate in numerous other states. Some of those smaller pharmacies chain operate at very few locations within Massachusetts. The net service revenue received for their multi – state operations may meet the thresholds contained in these regulations while in the alternative their revenue from their Massachusetts based operations could put them under those reporting benchmarks.

We would therefore respectfully ask that the final regulation be amended to clarify that the calculation of those two benchmarks be calculated based solely on the provider's Massachusetts based operations.

Thank you for your consideration of comments on these regulations.

Sincerely,

Patrick J. Huntington

Patrick J. Huntington
Counsel
617-922-0526
ph@mabayassoc.com