



To: The House Ways & Means Committee
From: The Vermont Pharmacists Association
Date: February 12, 2026
RE: H.577, Establishing the Vermont Prescription Drug Discount Card Program

The [Vermont Pharmacists Association](#) (VPA) is the only statewide association representing the interests of all pharmacists in Vermont. VPA provides continuing education, fosters networking opportunities, and advocates for a forward-looking legislative agenda that supports both the profession of pharmacy as well as the health of Vermonters.

VPA strongly believes that ensuring Vermonters have access to affordable prescription medications is essential to high-quality health care. Vermont pharmacists support medication affordability and routinely provide patient care services that extend well beyond the dispensing prescriptions. Independent community pharmacies in particular help lower prescription costs by offering competitive cash pricing for many medications.

As noted in prior testimony, ArrayRx is described as utilizing a cost pricing strategy intended to support fair pharmacy reimbursement. Testimony has indicated that pharmacies would negotiate reimbursement rates directly and that participation would not require pharmacies to absorb additional fees or dispense medications at a loss. Under this model, pharmacies are intended to be reimbursed for both the acquisition cost of the medication and a dispensing fee, which could allow pharmacies to participate with greater confidence.

However, based on our conversations with representatives from ArrayRx and our independent review of ArrayRx's pricing from the pharmacy perspective, it is clear that the program's pricing structure is not universally beneficial for Vermont pharmacies or patients. VPA met with ArrayRx representatives at the end of January and subsequently analyzed the program's pricing model as it applies at the pharmacy counter. From those discussions, we understand that pharmacies are required to remit a fee to ArrayRx, which is built into the patient's payment and intended to offset administrative costs.

To better understand the real-world impact, we conducted a comparison using a random sample of 10 prescription drugs, analyzing the cost of dispensing each through ArrayRx, GoodRx, and Vermont Medicaid.

Based on this sample, we found that in most cases, either the patient, the pharmacy, or both paid more when prescriptions were processed through ArrayRx compared to GoodRx and Vermont Medicaid. In only three out of the ten instances did the patient pay less than they would have with GoodRx while the pharmacy also realized a higher net profit. In other words, in 70%

of the prescriptions reviewed, the pharmacy and/or the patient was financially disadvantaged when using ArrayRx. Examples are provided on the following page.

Additionally, the Treasurer testified that participation in ArrayRx is not mandatory. While the bill itself does not explicitly require pharmacy participation, ArrayRx is already embedded in many pharmacy and pharmacy benefit manager (PBM) contracts. As a result, most Vermont pharmacies already accept ArrayRx, and in practical terms, may not be able to opt out.

VPA remains concerned about the impact of H.577 on Vermont pharmacies, particularly independent community pharmacies, as well as on patients. Based on our review, the ArrayRx discount card program does not consistently deliver greater savings for patients or improved reimbursement for pharmacies compared to other discount card programs.

Thank you for giving us the opportunity to testify on this issue. We appreciate your time and consideration, and we welcome any questions or follow-up conversations.