STATE OF NEW HAMPSHIRE
DEPARTMENT OF CORRECTIONS
DIVISION OF ADMINISTRATION
P.O. BOX 1806
CONCORD, NH 03302-1806
603-271-5607 FAX: 888-908-6609
TDD ACCESS: 1-800-735-2964
www.nh.gov/nhdoc

HELEN E. HANKS
COMMISSIONER

JONATHAN K. HANSON
DIRECTOR

80

May 24, 2023

The Honorable Ken Weyler, Chairman
Fiscal Committee of the General Court
State House
Concord, NH 03301

His Excellency, Governor Christopher T. Sununu
and the Executive Council
State House
Concord, NH 03301

REQUESTED ACTION

1. Pursuant to the provisions of Chapter 90, Laws of 2021, class footnote[1] for accounting unit 8236 *Pharmacy,* Class 100 *Prescription Drugs,* the New Hampshire Department of Corrections (NHDOC) respectfully requests authorization of additional funding in the amount of $479,030 for prescription drug expenses to cover projected shortfalls for the remainder of fiscal year 2023, effective upon Fiscal Committee and Governor and Executive Council approval through June 30, 2023. 100% General Funds.

2. Pursuant to RSA 9:16-a the NH Department of Corrections respectfully requests permission to transfer $286,136 among accounts listed on the attached detailed exhibit to reallocate appropriations and cover estimated shortfalls in Class 100 *Prescription Drugs* upon Fiscal Committee and Governor and Executive Council approval through June 30, 2023. 100% General Funds.

Funding is to be budgeted in and transfers are to occur from and within the accounts listed on the attached exhibits as follows:

The remainder of this page intentionally left blank.

[1] In the event that expenditures are greater than amounts appropriated, the Commissioner may request, with prior approval of the Fiscal Committee, that the Governor and Council authorize additional funding. Upon Fiscal Committee and Governor and Council approval, the Governor is authorized to draw a warrant from any money in the Treasury not otherwise appropriated.

02-46-46-463510-337200000 NH State Prison for Men				
Class	Description	Current Modified Budget	Requested Action	Current Revised Budget
010-500100	Personal Services - Permanent	$ 13,105,209		$ 13,105,209
011-500126	Personal Services - Unclassified	$ 133,955		$ 133,955
017-500147	FT Employees Special Payment	$ 102,035	$ (102,035)	$ -
018-500106	Overtime	$ 6,622,348		$ 6,622,348
019-500105	Holiday Pay	$ 455,873		$ 455,873
020-500200	Current Expenses	$ 156,117		$ 156,117
022-500255	Rents - Leases Other than State	$ 19,942		$ 19,942
023-500291	Heat-Electricity-Water	$ 2,501,023		$ 2,501,023
024-500225	Maint Other Than Build-Grn	$ 8,886		$ 8,886
030-500331	Equipment New/Replacement	$ 25,441		$ 25,441
039-500188	Telecommunications	$ 46,609		$ 46,609
040-501587	Indirect Costs	$ 118,679		$ 118,679
041-500801	Audit Fund Set Aside	$ 1,187		$ 1,187
050-500109	Personal Service-Temp/Appointed	$ 427,815		$ 427,815
060-500602	Benefits	$ 11,841,834		$ 11,841,834
068-500565	Remuneration	$ 425,601	$ (8,000)	$ 417,601
070-500704	In-State Travel Reimbursement	$ 132,313		$ 132,313
103-502664	Contracts for Operational Services	$ 79,007		$ 79,007
242-500787	Transportation of Inmates	$ 65,061		$ 65,061
	Total	$ 36,268,935	$ (110,035)	$ 36,158,900
	REVENUES			
	Total General Funds	$ 36,268,935	$ (110,035)	$ 36,158,900

02-46-46-463510-33730000 Northern NH Correctional Fclty				
Class	Description	Current Modified Budget	Requested Action	Current Revised Budget
010-500100	Personal Services - Permanent	$ 6,574,926		$ 6,574,926
011-500126	Personal Services - Unclassified	$ 125,820		$ 125,820
017-500147	FT Employees Special Payment	$ 54,066	$ (54,066)	$ -
018-500106	Overtime	$ 3,341,766		$ 3,341,766
019-500105	Holiday Pay	$ 183,145		$ 183,145
020-500200	Current Expenses	$ 68,733		$ 68,733
022-500255	Rents - Leases Other than State	$ 3,559		$ 3,559
023-500291	Heat-Electricity-Water	$ 1,157,864		$ 1,157,864
024-500225	Maint Other Than Build-Grn	$ 9,945		$ 9,945
030-500331	Equipment New/Replacement	$ 29,794		$ 29,794
039-500188	Telecommunications	$ 49,799		$ 49,799
040-501587	Indirect Costs	$ 61,304		$ 61,304
041-500801	Audit Fund Set Aside	$ 613		$ 613
050-500109	Personal Service-Temp/Appointed	$ 167,009		$ 167,009
060-500602	Benefits	$ 5,696,677		$ 5,696,677
068-500565	Remuneration	$ 219,047	$ (4,000)	$ 215,047
070-500704	In-State Travel Reimbursement	$ 103,271		$ 103,271
102-500731	Contracts for Program Services	$ 52,362		$ 52,362
103-502664	Contracts for Operational Services	$ 57,931		$ 57,931
	Total	$ 17,957,631	$ (58,066)	$ 17,899,565
	REVENUES			
	Total General Funds	$ 17,957,631	$ (58,066)	$ 17,899,565

02-46-46-463510-33740000 NH Correctional Facility/Women				
Class	Description	Current Modified Budget	Requested Action	Current Revised Budget
010-500100	Personal Services - Permanent	$ 3,397,938		$ 3,397,938
011-500126	Personal Services - Unclassified	$ 116,405		$ 116,405
017-500147	FT Employees Special Payment	$ 24,183	$ (24,183)	$ -
018-500106	Overtime	$ 1,167,623		$ 1,167,623
019-500105	Holiday Pay	$ 105,752		$ 105,752
020-500200	Current Expenses	$ 33,156		$ 33,156
022-500255	Rents - Leases Other than State	$ 4,381		$ 4,381
023-500291	Heat-Electricity-Water	$ 372,577		$ 372,577
024-500225	Maint Other Than Build-Grn	$ 1,587		$ 1,587
030-500331	Equipment New/Replacement	$ 2,101		$ 2,101
039-500188	Telecommunications	$ 26,674		$ 26,674
040-501587	Indirect Costs	$ 27,509		$ 27,509
041-500801	Audit Fund Set Aside	$ 275		$ 275
050-500109	Personal Service-Temp/Appointed	$ 133,707		$ 133,707
060-500602	Benefits	$ 3,355,199		$ 3,355,199
068-500565	Remuneration	$ 47,804		$ 47,804
070-500704	In-State Travel Reimbursement	$ 6,865		$ 6,865
102-500731	Contracts for Program Services	$ 143,089		$ 143,089
103-502664	Contracts for Operational Services	$ 23,700		$ 23,700
	Total	$ 8,990,525	$ (24,183)	$ 8,966,342
	REVENUES			
	Total General Funds	$ 8,990,525	$ (24,183)	$ 8,966,342

02-46-46-464510-41060000 Concord Transitional Work Ctr				
Class	Description	Current Modified Budget	Requested Action	Current Revised Budget
010-500100	Personal Services - Permanent	$ 598,783		$ 598,783
017-500147	FT Employees Special Payment	$ 5,955	$ (5,955)	$ -
018-500106	Overtime	$ 253,640		$ 253,640
019-500105	Holiday Pay	$ 24,778		$ 24,778
020-500200	Current Expenses	$ 5,854		$ 5,854
022-500255	Rents - Leases Other than State	$ 1,723		$ 1,723
024-500225	Maint Other Than Build-Grn	$ 62,344		$ 62,344
023-500291	Heat-Electricity-Water	$ 528		$ 528
030-500331	Equipment New/Replacement	$ 23,953		$ 23,953
039-500188	Telecommunications	$ 2,679		$ 2,679
040-501587	Indirect Costs	$ 4,008		$ 4,008
041-500801	Audit Fund Set Aside	$ 41		$ 41
050-500109	Personal Service-Temp/Appointed	$ 33,302		$ 33,302
060-500602	Benefits	$ 618,992		$ 618,992
068-500565	Remuneration	$ 72,910	$ (8,000)	$ 64,910
070-500704	In-State Travel Reimbursement	$ 88		$ 88
103-502664	Contracts for Operational Services	$ 21,252		$ 21,252
	Total	$ 1,730,830	$ (13,955)	$ 1,716,875
	REVENUES			
	Total General Funds	$ 1,730,830	$ (13,955)	$ 1,716,875

02-46-46-464510-51720000 Shea Farm				
Class	Description	Current Modified Budget	Requested Action	Current Revised Budget
010-500100	Personal Services - Permanent	$ 649,531		$ 649,531
017-500147	FT Employees Special Payment	$ 5,839	$ (5,839)	$ -
018-500106	Overtime	$ 169,059		$ 169,059
019-500105	Holiday Pay	$ 16,284		$ 16,284
020-500200	Current Expenses	$ 4,067		$ 4,067
022-500255	Rents - Leases Other than State	$ 1,596		$ 1,596
023-500291	Heat-Electricity-Water	$ 28,057		$ 28,057
024-500225	Maint Other Than Build-Grn	$ 528		$ 528
030-500331	Equipment New/Replacement	$ 79,158		$ 79,158
039-500188	Telecommunications	$ 5,734		$ 5,734
040-501587	Indirect Costs	$ 5,846		$ 5,846
041-500801	Audit Fund Set Aside	$ 58		$ 58
060-500602	Benefits	$ 473,629		$ 473,629
070-500704	In-State Travel Reimbursement	$ 1,912		$ 1,912
103-502664	Contracts for Operational Services	$ 2,499		$ 2,499
	Total	$ 1,443,797	$ (5,839)	$ 1,437,958
	REVENUES			
	Total General Funds	$ 1,443,797	$ (5,839)	$ 1,437,958

02-46-46-464510-71070000 North End House				
Class	Description	Current Modified Budget	Requested Action	Current Revised Budget
010-500100	Personal Services - Permanent	$ 451,871		$ 451,871
017-500147	FT Employees Special Payment	$ 4,085	$ (4,085)	$ -
018-500106	Overtime	$ 133,002		$ 133,002
019-500105	Holiday Pay	$ 9,004		$ 9,004
020-500200	Current Expenses	$ 3,440		$ 3,440
022-500255	Rents - Leases Other than State	$ 1,687		$ 1,687
023-500291	Heat-Electricity-Water	$ 35,367		$ 35,367
024-500225	Maint Other Than Build-Grn	$ 528		$ 528
039-500188	Telecommunications	$ 3,386		$ 3,386
040-501587	Indirect Costs	$ 4,575		$ 4,575
041-500801	Audit Fund Set Aside	$ 46		$ 46
060-500602	Benefits	$ 348,767		$ 348,767
070-500704	In State Travel Reimbursement	$ 55		$ 55
	Total	$ 995,813	$ (4,085)	$ 991,728
	REVENUES			
	Total General Funds	$ 995,813	$ (4,085)	$ 991,728

02-46-46-464510-78740000 Calumet House				
Class	Description	Current Modified Budget	Requested Action	Current Revised Budget
010-500100	Personal Services - Permanent	$ 662,005		$ 662,005
017-500147	FT Employees Special Payment	$ 4,439	$ (4,439)	$ -
018-500106	Overtime	$ 256,477		$ 256,477
019-500105	Holiday Pay	$ 22,739		$ 22,739
020-500200	Current Expenses	$ 5,997		$ 5,997
022-500255	Rents - Leases Other than State	$ 1,687		$ 1,687
023-500291	Heat-Electricity-Water	$ 52,585		$ 52,585
024-500225	Maint Other Than Build-Grn	$ 528		$ 528
039-500188	Telecommunications	$ 4,612		$ 4,612
040-501587	Indirect Costs	$ 5,892		$ 5,892
041-500801	Audit Fund Set Aside	$ 59		$ 59
060-500602	Benefits	$ 546,992		$ 546,992
070-500704	In-State Travel Reimbursement	$ 4,717		$ 4,717
103-502664	Contracts for Operational Services	$ 4,215		$ 4,215
	Total	$ 1,572,944	$ (4,439)	$ 1,568,505
	REVENUES			
	Total General Funds	$ 1,572,944	$ (4,439)	$ 1,568,505

02-46-46-465010-58330000 Secure Psychiatric Unit				
Class	Description	Current Modified Budget	Requested Action	Current Revised Budget
010-500100	Personal Services - Permanent	$ 2,105,576		$ 2,105,576
017-500147	FT Employees Special Payment	$ 9,579	$ (9,579)	$ -
018-500106	Overtime	$ 575,124		$ 575,124
019-500105	Holiday Pay	$ 62,279		$ 62,279
020-500200	Current Expenses	$ 28,479		$ 28,479
022-500255	Rents - Leases Other than State	$ 2,389		$ 2,389
024-500225	Maint Other Than Build-Grn	$ 18,105		$ 18,105
039-500188	Telecommunications	$ 9,093		$ 9,093
040-501587	Indirect Costs	$ 16,591		$ 16,591
041-500801	Audit Fund Set Aside	$ 166		$ 166
050-500109	Personal Service-Temp/Appointed	$ 66,604		$ 66,604
060-500602	Benefits	$ 1,564,321		$ 1,564,321
068-500565	Remuneration	$ 35,166		$ 35,166
070-500704	In-State Travel Reimbursement	$ 2,209		$ 2,209
101-500730	Medical Payments to Providers	$ 59,139		$ 59,139
103-502664	Contracts for Operational Services	$ 5,632		$ 5,632
	Total	$ 4,560,452	$ (9,579)	$ 4,550,873
	REVENUES			
	Total General Funds	$ 4,560,452	$ (9,579)	$ 4,550,873

02-46-46-465010-82350000 Residential Treatment Program				
Class	Description	Current Modified Budget	Requested Action	Current Revised Budget
010-500100	Personal Services - Permanent	$ 1,750,861		$ 1,750,861
017-500147	FT Employees Special Payment	$ 5,021	$ (5,021)	$ -
018-500106	Overtime	$ 255,175		$ 255,175
019-500105	Holiday Pay	$ 29,650		$ 29,650
020-500200	Current Expenses	$ 17,259		$ 17,259
039-500188	Telecommunications	$ 6,165		$ 6,165
040-501587	Indirect Costs	$ 10,594		$ 10,594
041-500801	Audit Fund Set Aside	$ 106		$ 106
060-500602	Benefits	$ 1,274,409		$ 1,274,409
070-500704	In State Travel Reimbursement	$ 2,093		$ 2,093
103-502664	Contracts for Operational Services	$ 900		$ 900
	Total	$ 3,352,233	$ (5,021)	$ 3,347,212
	REVENUES			
	Total General Funds	$ 3,352,233	$ (5,021)	$ 3,347,212

02-46-46-465010-82360000 Pharmacy				
Class	Description	Current Modified Budget	Requested Action	Current Revised Budget
010-500100	Personal Services - Permanent	$ 633,125		$ 633,125
011-500126	Personal Services - Unclassified	$ -		$ -
018-500106	Overtime	$ 8,184		$ 8,184
019-500105	Holiday Pay	$ 102		$ 102
020-500200	Current Expenses	$ 33,401		$ 33,401
024-500225	Maint Other Than Build-Grn	$ 4,707		$ 4,707
030-500331	Equipment New/Replacement	$ 48,291		$ 48,291
039-500188	Telecommunications	$ 3,333		$ 3,333
040-501587	Indirect Costs	$ 773		$ 773
041-500801	Audit Fund Set Aside	$ 8		$ 8
060-500602	Benefits	$ 326,230		$ 326,230
070-500704	In-State Travel Reimbursement	$ 282		$ 282
100-500726	Prescription Drug Expenses	$ 3,811,569	$ 765,166	$ 4,576,735
103-502664	Contracts for Operational Services	$ 460		$ 460
	Total	$ 4,870,465	$ 765,166	$ 5,635,631
	REVENUES			
	Total General Funds	$ 4,870,465	$ 765,166	$ 5,635,631

02-46-46-465510-66320000 Maintenance				
Class	Description	Current Modified Budget	Requested Action	Current Revised Budget
010-500100	Personal Services - Permanent	$ 1,222,044		$ 1,222,044
017-500147	FT Employees Special Payment	$ 934	$ (934)	$ -
018-500106	Overtime	$ 135,866		$ 135,866
019-500105	Holiday Pay	$ 5,340		$ 5,340
020-500200	Current Expenses	$ 78,655		$ 78,655
022-500255	Rents - Leases Other than State	$ 2,097		$ 2,097
024-500225	Maint Other Than Build-Grn	$ 87,800		$ 87,800
030-500331	Equipment New/Replacement	$ 106,914		$ 106,914
039-500188	Telecommunications	$ 14,053		$ 14,053
040-501587	Indirect Costs	$ 4,634		$ 4,634
041-500801	Audit Fund Set Aside	$ 46		$ 46
047-500240	Own Forces Maint Build-Grn	$ 305,480		$ 305,480
048-500226	Contractual Maint Build-Grn	$ 625,799		$ 625,799
050-500109	Personal Service-Temp/Appointed	$ 24,773		$ 24,773
060-500602	Benefits	$ 936,837		$ 936,837
070-500704	In-State Travel Reimbursement	$ 18,831		$ 18,831
	Total	$ 3,570,103	$ (934)	$ 3,569,169
	REVENUES			
	Total General Funds	$ 3,570,103	$ (934)	$ 3,569,169

02-46-46-465510-66340000 Kitchen				
Class	Description	Current Modified Budget	Requested Action	Current Revised Budget
010-500100	Personal Services - Permanent	$ 812,553		$ 812,553
018-500106	Overtime	$ 246,311		$ 246,311
019-500105	Holiday Pay	$ 27,009		$ 27,009
020-500200	Current Expenses	$ 98,878		$ 98,878
021-500211	Food Institutions	$ 2,744,045	$ (50,000)	$ 2,694,045
022-500255	Rents - Leases Other than State	$ 480		$ 480
030-500331	Equipment New/Replacement	$ 93,288		$ 93,288
039-500188	Telecommunications	$ 2,889		$ 2,889
040-501587	Indirect Costs	$ 2,799		$ 2,799
041-500801	Audit Fund Set Aside	$ 28		$ 28
060-500602	Benefits	$ 772,170		$ 772,170
	Total	$ 4,800,450	$ (50,000)	$ 4,750,450
	REVENUES			
	Total General Funds	$ 4,800,450	$ (50,000)	$ 4,750,450

EXPLANATION

Class 017 *FT Employees Special Payments* has a surplus of $216,136. During the FY 2022-2023 budgeting process, the budget system was unable to accommodate the recently collectively bargained increase in hazardous duty pay and longevity pay in Class 10 Personal Services-Permanent and Class 060 Benefits for corrections officers and corporals. The increase was budgeted in Class 017 FT Employees Special Payments, in anticipation of transferring the funds as needed in the future.

Class 021 *Food Institutions* has an estimated surplus of $50,000.

Class 068 *Remuneration* has an estimated surplus of $20,000.

Class 100 *Prescription Drugs* has an estimated shortfall of $765,166 due to several factors. Treatment of hepatitis C (HCV) has had a huge impact on pharmaceutical costs for the NHDOC. Despite our status as a 340B* entity, costs for treating this serious, and potentially deadly disease, have spiraled. The Centers for Disease Control and Prevention (CDC) cite a 124% increase in HCV infections since 2013 in the United States. The National Hepatitis Corrections Network reports that over 30% of the total population of U.S. citizens infected with HCV are in correctional facilities. Chronic infection rates range between 12% and 35% of the population in prisons and jails.

For calendar year 2023, the NHDOC has fully treated 21 individuals and have 32 others currently being treated with generic drug Epclusa. There are also eight patients due to start for a total of 61 patients in this year to receive treatment. The cost for Epclusa is $4,773.18 for 28 days. Full treatment requires 84 days of medication. The treatment for these 61 individuals will cost $873,491.94. This is with our 340B pricing.

Zepatier is also a treatment for HCV. The NHDOC has treated five individuals and has four that are currently in treatment. The pricing for 28 days is $3,191.06, requiring 84 days of treatment. These nine patients will cost $86,158.62 even with 340B pricing. At the close of 2023, we will have spent $959,651 to treat patients with HCV.

Non-340b medication have also had a significant impact. Twelve medications make up half of our pharmacy spending for this fiscal year. One of these medications, Jakafi, is used to treat one patient at a cost to the department of $196,227 yearly. One surgery for a hemophiliac required injectable factor, at a cost of $57,672.30. Invega, a long-acting injectable anti-psychotic, has cost the department $279,950 in this fiscal year compared to $173,443 for the same time in the previous fiscal year.

While the numbers of patients treated with HCV has grown, inflation and other factors have driven the cost of pharmaceutical agents to unprecedented highs.

During the period of July 2021 to June 2022, there were over 1,200 medications whose price increase exceeded the inflation rate. The average increase for these medications was 31.6% per the Office of the Assistant Secretary for Planning and Evaluation. More than 3000 medications saw price increases in the first half of 2022. For example, the price of fluconazole (a common antifungal medication) has risen over 1000% since 2021. According to AARP, if the price of a gallon of milk had risen as fast as medication costs in 2020 that same gallon would cost $13.00 versus $3.23.**

At the beginning of 2023, over 450 medication prices increased. The Medicare Prescription Drug Inflation Rebate Program is one of the attempts to quell the increase, but until it is fully functional, we can likely expect to see manufacturers continue to take advantage of the time they have left unregulated.

Like other healthcare institutions, the NHDOC is subject to higher costs caused by inflation, private industry initiatives, and the number of people who become diagnosed with serious healthcare conditions. We have several strategies in place to help control costs.

Our monthly Pharmacy and Therapeutics Committee regularly reviews costs of medications and how they are used. Our Chief Medical Officer and Chief Psychiatric Officer conduct audits of medical records to ensure that medications are being prescribed in accordance to diagnoses and industry standards. We continue to align our formulary to the State of New Hampshire's Medicaid formulary. Pharmacy is frequently reviewing our higher cost items and seeking alterative more cost-effective treatments that still meet the needs of our patient population. We are also seeking out contracts that will potentially reduce the cost of 340B and non-340B medications to the NHDOC. This includes a rebate program that is being offered to us by Fusion the software vendor of our pharmacy management program, CIPS.

Transfer $216,136 from Class 017 *FT Employees Special Payments*

- $ 102,035 from accounting unit 3372 NH State Prison for Men
- $ 54,066 from accounting unit 3373 Northern NH Correctional Fclty
- $ 24,183 from accounting unit 3374 NH Correctional Facility/Women
- $ 5,955 from accounting unit 4106 Concord Transitional Work Ctr
- $ 5,839 from accounting unit 5172 Shea Farm-Transitional Housing
- $ 9,579 from accounting unit 5833 Secure Psychiatric Unit
- $ 934 from accounting unit 6632 Maintenance
- $ 4,085 from accounting unit 7107 North End House
- $ 4,439 from accounting unit 7874 Calumet-Transitional Housing
- $ 5,021 from accounting unit 8235 Residential Treatment Program

Transfer $20,000 from Class 068 *Remuneration*:

- $ 8,000 from accounting unit 3372 NH State Prison for Men
- $ 4,000 from accounting unit 3373 Northern NH Correctional Fclty
- $ 8,000 from accounting unit 4106 Concord Transitional Work Ctr

Transfer $50,000 from Class 021 *Food Institutions*:

- $ 50,000 from accounting unit 6634 Kitchen

Transfer $286,136 to Class 100 *Prescription Drugs*:

- $276,136 to accounting unit 8236 Pharmacy

The following information is provided in accordance with the Budget Officer's instructional memorandum dated April 17, 1985 to support the above requested actions.

A. Does transfer involve continuing program or one-time projects?
   These transfers involve continuing programs.

B. Is this transfer required to maintain existing program level or will it increase the program level?
   All transfers listed will be used to maintain existing program levels.

C. Cite any requirements that make this program mandatory.
   RSA 623-C:2 and the Constitutional Eighth Amendment

D. Identify the source of the funds on all accounts listed on this transfer.
   All accounting units are General Funds.

E. Will there be any effect on revenue if this transfer is approved or disapproved?
   There will not be any effect on revenue.

F. Are funds expected to lapse if this transfer is not approved?
   General Funds- All Classes, if not fully expended, will lapse.

G. Are personnel services involved?
   No new positions are being funded by this transfer.

Respectfully Submitted,

Helen E. Hanks
Commissioner

*340B is a federal program that allows participating entities to purchase medications at significantly lower rates than through other purchasing venues.
**What if Milk Prices Rose as Fast as Prescription Drugs? (aarp.org)
Price Increases for Prescription Drugs, 2016-2022 | ASPE (hhs.gov)
Drug Prices for Many Medications Outpace Inflation (aarp.org)
Prices Increase on 450 Drugs to Start 2023 (personalimportation.org)