To ensure a high-quality audio experience for all, please:

- Connect to audio using your phone (NOT your computer.)
- **Enter your personal Attendee ID** (located in the left-hand box, below the access code) when dialing in.

**Today’s slides & handouts can be downloaded from the NACHC Pharmacy/ 340B webpage**

- Or just google “NACHC 340B”
  - Scroll about halfway down the page, and look under “Office Hours” then “Nov 2018”
Pharmacy Access Office Hours

November 15, 2018

Focus Topic: Pharmacy Dashboards

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Today’s Agenda

• Operational updates
• Brief presentation on “focus topic” – Pharmacy Dashboards
• Q&A

Please use the Chat Box during the session to ask questions, add info, etc. There will be time for Q&A at the end.

Today’s slides & handouts can be downloaded from the NACHC webpage:
• http://www.nachc.org/policy-matters/regulatory-issues/reg-340b-drug-discount-program/
• Or google “NACHC Pharmacy 340B”

Scroll about halfway down the page, and look under “Office Hours” then “Nov 2018”
OPERATIONAL UPDATES

Colleen Meiman
Senior Policy Advisor
National Association of Community Health Centers
cmeiman@nachc.org
The Trump Administration has proposed allowing this to go into effect on January 1.

This reg will:
- make “penny pricing” official
- allow HRSA to fine manufacturers who “knowingly and willingly” overcharge for 340B drugs.

While the reg was finalized under Obama, the current Administration had delayed its effective date five times.
HHS is working on a proposal intended to lower how much Medicare pays for drugs under **Part B**, by piloting 3 strategies:

- Linking prices to the prices charged in 16 similar countries
- Allowing negotiations with drug manufacturers re: prices
- Changing incentives that encourage doctors to prescribe high-costs Rx.

This proposal:

- Would not directly affect FQHC reimbursement, because of our separate PPS payment system
- Is a long way from becoming reality, or national in scope
- Is already meeting significant pushback.

340B Hospitals also pushing back on expansion of Part B cuts.
Registering a New Contract Pharmacy?

When you register a new contract pharmacy arrangement on OPAIS, and remember that HRSA may ask you to submit the contract to ensure that it:

1. Is dated **prior** to the registration period
2. Lists **all provider and all contract pharmacy locations, with addresses that are** identical to those that were registered.
3. Includes **signatures** of officials from both the entity and the pharmacy.
Contracting Issues

- Health Centers – and other 340B providers -- are continuing to receive contract addendums from third-party groups offering reimbursement/fee structures that are inconsistent with Congressional intent.

- Increased awareness of this issue outside of the provider community.
340B Health has engaged Sue Veer to develop and coordinate the FQHC-focused sessions and speakers for their next conference.

The 2 FQHC Education Sessions will focus on “the leaky hose” (aka “Contracting Consistent with Congressional Intent”.)

Sue is seeking suggestions for speakers, particularly for the plenaries.

Please send suggestions to Sue at 340brx@carolinahealthcenters.org
A Couple Reminders

1. Whenever possible, please register your sites with HRSA during the regular two-week window at the start of the quarter. *The extended windows should be used only when absolutely necessary.*

2. For a Mirena-like IUD at $50 each, contact MDiallo@Medicines360.org

3. FQHCs may use 330 funds to purchase Emergency Contraception, and to dispense it to their patients.
SUMMARY OF OPERATIONAL UPDATES

1. The Trump Administration has proposed allowing the Obama-era reg on ceiling prices and manufacturer fines to go into effect on Jan. 1, 2019.

2. While the Administration’s proposed changes to drug reimbursement under Medicare could be significant, they will not impact FQHCs directly.

3. Be sure your contracts with contract pharmacies meet all requirements before submitting them.

4. Submit suggested topics and speakers for the next 340B Coalition conference to Sue Veer at 340Brx@carolinahealthcenters.org.
Looking Ahead (& Back)

Next Office Hours: Thursday Dec. 20, 2:00 – 3:00 Eastern

Focus Topic: TBD. Options include:

• Working with the OPA database
• Working with community pharmacies
• Pharmacy Oversight Committees
• DIR fees

Difficulties downloading recording of last month’s Office Hours…
Focus Topic:
PHARMACY DASHBOARDS

Presenter:
Judy Lapinksni
Former FQHC Pharmacist and PCA CEO
JLHealthcareSolutions@gmail.com
Located on the NACHC Rx webpage:

- Or google “NACHC Pharmacy 340B”
- Scroll about halfway down the page, and look under “Office Hours” then “Nov 2018”

- **From Judy Lapinski:** Rx Operations Trend Report – JL
  340B Trend Report - JL

- **From Darren Marsh:** Sample Rx Dashboard #2 – DM

- **From Sue Veer:** Sample Rx Dashboard #3 – SV;
  Sample Capture Rate Excel Doc - SV
Q&A
Q: My health center got a letter from a group called Kalderos, requesting data on prescriptions dispensed to Medicaid patients. Should we respond?

• Yes, we encourage you to respond promptly and provide them with the data they requested.

• Kalderos is acting on behalf of multiple drug manufacturers, who have the right to request this information.

• Failure to respond promptly can increase the chances of being subject to a full-scale manufacturer auditor.
Q: If one of our established patients decides on their own to see a specialist, and receives a prescription from them, can the prescription be 340B-eligible if their PCP at our health center co-signs it?

Health centers are strongly advised against having their providers rewrite or “co-sign” prescriptions that were written by non-FQHC providers (e.g., specialists) for FQHC patients. This practice raises significant liability concerns. Health centers should consider having an official policy on this issue, in order to demonstrate that your health center has considered this issue and made an official determination of your position.
Other Questions?

Colleen Meiman, cmeiman@nachc.org