



Pharmacy Office Ho

April 16, 2020

Focus Topic: Sto
Education

This session is supported by the Health Resource (HRSA) of the U.S. Department of Health and Human Services through a grant award totaling \$6,375,000. The contents are those of the speakers and do not necessarily represent the official views of, nor are they endorsed by, the U.S. Government. For more information, please contact [hrsa@hhs.gov](#).

WEBINAR LOGISTICS

We strongly recommend calling in **on your telephone**

Phone: 866-469-3239

Access Code:
632 274 023 #

Your Attendee ID:
Listed below the access code in the box under "Select Audio Connection".

To ask/ answer a question, or share a comments, please use the Chat box on the right hand side of the screen.

You can view the slides from N

<http://www.nachc.org/areas/press-releases>

Or go to the

THE NACHC MISSION

America's Voice for Community Health Care

The National Association of Community Health Centers founded in 1971 to promote efficient, high quality health care that is accessible, culturally and linguistically appropriate, community directed, and patient centered for all.



Agenda

- Operational Updates Tim Mallett, RPh
- Focus Topic: Staff 340B Education Jangus Whitne
- Q&A

*Discussions
box through
pres*

Operations:

As of 4/16/2020

Site registration in the era of COVID-19

- Normal enrollment ended yesterday, April 15.
- HRSA has announced that they will allow CEs immediate enrollment “upon request and review”
- For information on how to register your site please see the FAQs here:
<https://www.hrsa.gov/opa/COVID-19-resources>



340B University *JUST* for Health Centers

NACHC CHI Conference

- Sat, August 29, 2020, in San Diego, CA.
- Is free, but please preregister (google “340B University” for link)



What is 340B U FQH

- A full-day, free training session covering various aspects of 340B strategy. Hosted by Apexus, HRSA's 340B program arm.
- Unlike other sessions at 340B University, these sessions focus on the specific needs of community health centers and are taught by experts in the field.
- Appropriate for community health center pharmacy staff, community health center leadership, and other interested parties.

Telehealth and 340B

- 340B use for Rxs from Telehealth visits is allowed
 - Prescriber employed by or under contract with CE
 - Medical Records of telehealth visit
 - Within scope of CE's Grant
- From Derek Pihl
 - We just added clarification to our existing "340B Eligible Definition Policy" that "'health care services' means in-person telehealth visits, including either video or telephone, with professional."

Pharmacists response to COVID-19

- APhA offering training for pharmacists on COVID-19 specimen
- <http://elearning.pharmacist.com/products/6020/covid-19-nasopharygeal-specimen-collection-training> This training is free to members and non-members alike.
- NO information on billing
- NCPA issued a fact sheet on COVID-19 testing at Community Pharmacies
<https://ncpa.org/sites/default/files/2020-04/COVID-19-testing-info-for-NCPA-members.pdf>
- Need to have CLIA certificate of waiver
<https://www.cms.gov/Regulations-and-Guidance/Legislation/CLIA/Downloads/HowObtainCertificateofWaiver.pdf>

Kalderos update

- New platform
https://www.prnewswire.com/news-releases/kalderos-launches-review-an-enhanced-340b-claims-verification-platform-301041030.html?tc=eml_cleartime
- Reviewing CAD claims
 - Uses ICN/CCN
 - Option to respond “Cannot locate ICN/CCN”
 - Per Steve at Kalderos – CHC will not be at greater risk for a manufacturer audit if they select the option above
- See NP for additional info

One more thing.....

- May Office Hours Focused Topic – Sliding Fee Scale: A new approach to assisting eligible patients.
- COVID-19 Noddlepod – Please contact me tmallett@340Basics.com or Susan Hansen shansen@NACHC.COM if you would like to have access to this information.
- 340B Health Summer Conference – Sue Veer



Please do the one-minute evaluation

<https://www.surveymonkey.com/r/XTM>

(Your responses help us demonstrate to BPHC that our sessions are a valuable use of their funding)

Focus Topic: ***340B Education for FQHC S***

Jangus Whitner, PharmD, 340B ACE
Clinical Pharmacist & 340B Program Manager
PrimaryOne Health



jangus.whitner@prim



[@Whitner_Jangus](https://twitter.com/Whitner_Jangus)



linkedin.com/in/jangus

NACHC Pharmacy Access
Thursday

Disclosure:

I do not have any actual or potential financial conflicts of interest.

Disclaimer:

Always check with legal counsel, Apexus, HRSA, another trusted resource before making any changes that could impact compliance.

My Health Center

15

- Tier III NCQA PCMH Accredited Federally Qualified Health Center
- Serve ~48,000 unique patients annually
 - 35% of patients are uninsured
 - 43% of patients have Medicaid



- 11 medical, 3 dental, 3 vision sites throughout central Ohio (Franklin & Pickaway County)

- Services:

Primary Care	Clinical Pharmacy Services
Behavioral Health	Dietary/Nutrition
Dental	Substance Use Disorder
Vision	Physical Therapy

- 340B Program is contract pharmacy **only**

My Health Center (cont.)



16

- Staff Overview:
 - 315+ total employees
 - 70 Prescribing Practitioners (*includes Clinical Pharmacists*)
- Pharmacy Dept
 - Clinical Pharmacists:
 - 3 full-time, 1 part-time contracted
 - 1 PGY2 Ambulatory Care Pharmacy Resident
 - 340B Team:
 - 340B Program Manager (splits time as Clinical RPh 2 days/)
 - 340B Coordinator (full-time)
 - 340B Support Specialist (full-time)

Importance of Staff Education

17

Who needs educated on 340B?

- First groups to come to mind:
 - Pharmacy/340B Team
 - Prescribing Providers

- Reality: **EVERYONE** *(at least to some extent)*



Importance of Staff Education (cont.)

18

- Can you generate 340B savings and never educate a single staff member outside of your 340B team
 - Of course you can... but the lost opportunity for your organization and your patients is tremendous
- Staff education is ESSENTIAL to optimizing your program
 - Frontline staff are your eyes/ears and have direct interaction with patients
 - How can your patients know how to take advantage of 340B if your staff cannot explain it to them?

19

Educational Sessions

Types & Frequency

Our Education Schedule

Type	Audience	Time	Details
New Hire Orientation	Any new hire, regardless of position*	30 min	Intro to 340B, program purpose, program structure, contract pharmacy network, program impact (how we save on 340B savings), compliance, key points depending on position
340B “Lunch & Learns”	Clinic staff at each individual site	30 min + 15 min Q&A	Same as above Most important part of this session is the time for Q&A
Pharmacy Mtgs	Clinical pharmacists, pharmacy resident, 340B team	15 min	Updates, troubleshooting 340B issues when embedded in the clinic, navigating common PCP questions
Nursing Mtgs	LPNs & RNs	15 min + 10 min Q&A	Clinic Administered Medications (workflows, compliance with diversion/duplicate discount, etc.)
All-Practitioner Mtg	All providers/practitioners (PCPs, dental, vision, pharmacists, BH, PT, etc.)	10 min + 5 min Q&A	Targeted topics such as: cash program, formulary, prescribing practices
All-Staff Mtg	All 315+ staff members	15 min	Review of 340B purpose, program updates, and overview of program impact over past year

Schedule Overview (cont.)

21

Type	Audience	Time	Details
Apexus 340B Univ On-Demand	340B Team Members	Ongoing	https://www.340bpvp.com/education/340b-u-ondemand/
Policy Updates & High Level 340B	340B Oversight Committee & SLT	Varies	HRSA policies, impact of national legislation, etc.
340B Coalition Conferences	340B Program Manager	2.5 days/ conference	www.340bwinterconference.org/ www.340bsummerconference.org/
Apexus 340B University LIVE	340B Team Members & SLT if possible	8-hour day	https://www.340bpvp.com/education/340b-university/



22

Tailoring to the Audience

Tailoring your Content

23

- At the end of each slide deck, I try to provide a summary of key points related to the role of the audience
- For example:

Prescribing Providers

- Remember: **WRITE FOR 90 DAY SUPPLIES!**
- E-prescribe controlled Rx's whenever possible (preferred over print)
- Medication not covered on patient's insurance?
 - Before you request to switch that med from Insurance to the 340B Program, you should make a good faith effort to:
 - Choose the preferred drug on insurance formulary
 - OR
 - Complete the Prior Authorization
- Recognize & follow up when a patient may need a Financial Hardship
 - Send patient back to front desk to ensure Proof of Income is on file

DPS, MA, LPN, RN

- Recognize barriers to medication access during visits and inform patient
- Identify when to properly use a Prior Authorization (instead of 340B)
- Identify when patients are not using a 340B pharmacy (both insured and uninsured) and offer to patients the option to fill at one of our community pharmacies.

Helpful Tips

24

- Continuously update the slides after each session
 - Listen to & take notes of questions/comments from audience
 - Goal: Routinely review and update your slides/handouts to be clearer for next time
 - Slides/Handout should be a RESOURCE for staff to refer to when on the job
- Create a running list of FAQs
 - Update that after every education session
- Post the handouts/FAQs on your intranet/shared drive

Education does NOT stop after your prese

25

□ **Make sure your staff know how to reach you!**

- Staff should be comfortable communicating with you
- Better flow of communication =
 - Increased awareness of issues before they snowball
 - Streamlined medication access for patients
 - Opportunity to correct misconceptions early
- Steps we have taken:
 - Shared EMR Inbox for 340B Team
 - Staff do not have to remember 340B team member names
 - Easier to cover queue when a team member is off
 - Shared 340B Phone Extension that rings to all our

26

Competency Quiz

Quiz Contents

27

	Possible Options (Individualized for each FQHC)
Who should take it?	<ul style="list-style-type: none">• Just 340B team members• 340B Oversight Committee members• All Employees <p>Could also consider different quizzes depending on staff t</p>
How should it be administered?	<ul style="list-style-type: none">• Paper• Online Survey (e.g. Survey Monkey®)
When should it be administered?	<ul style="list-style-type: none">• At New Hire• Immediately after completing Apexus 340B University• Annually for certain staff
What should they be quizzed on?	<ul style="list-style-type: none">• Basics of 340B program intent/purpose• Patient eligibility• Compliance considerations specific to your health cent<ul style="list-style-type: none">• Employee use of 340B drugs (when is it appropria• Proper CAD process: prevention of diversion, dupl (be specific to your carve-in/out status)• Material Breach Threshold

Example Competency Quiz

28

- Hannah Rowell, 340B Program Manager at Erie Family Health Centers, has graciously shared the Competency Quiz example on the following slides

- Her approach:
 - She gives the quiz 1x/year to her internal 340B team (members consist of pharmacy, clinical, purchasing, and finance depts)
 - She began with paper format, but has recently converted to SurveyMonkey®

- Access to quiz:
 - <https://nachc.noddlepod.com/groups/1577/posts/2>

Example Competency Quiz

Erie Family Health Centers
340B Program
Competency Quiz

Print Name _____

1. The 340B program was enacted by Congress in 1992. What was the congressional intent of the program?
2. "Diversion" is a key 340B compliance item.
 - a. What does "diversion" mean in the context of 340B?
 - b. What is Erie's greatest area of diversion risk?
3. "Duplicate Discounts" are prohibited.
 - a. How does a "Duplicate Discount" occur?
 - b. Within Erie's 340B program, what is an example of an instance where a Duplicate Discount could occur?
4. Which party is ultimately responsible for 340B program compliance?

a. HRSA	e. Apexus
b. Walgreens	f. IL Dept of Healthcare & Family Services
c. Erie	g. AllCare
d. OPAIS	h. Drug Manufacturers

Example Competency Quiz (cont.)

- 5. What makes a patient eligible to receive a 340B drug?
 - a. Erie has an established relationship with the individual and maintains records of the individual's health
 - b. The individual must receive health care services from a health care professional who either is employed covered entity or provides health care under contractual or other arrangements (such as referral for consultation) such that the responsibility for the care remains with the covered entity.
 - c. The individual must receive health care services that are consistent with the service or range of service: FQHC status.
 - d. All of the above

- 6. Erie follows the "closed loop" model for assessing referral script eligibility. Referral scripts are only deemed eligible if they meet the 340B qualification criteria. Please determine whether the following steps in the "closed loop" process are required or optional (circle):

Required - Optional	1) Patient is an Erie patient, seen in the health center by an Erie provider
Required - Optional	2) Erie provider documents a referral out to an external provider.
Required - Optional	3) Patient completes the referral appointment and receives a prescription
Required - Optional	4) The external provider sends a progress note or visit summary to Erie and the document is saved in patient's EMR chart.

- 7. Can an Erie employee receive 340B drugs? Please explain.
- 8. Please complete the blanks in Erie's 340B Material Breach policy: Material breach = An instance of noncompliance which exceeds ____% of Erie's _____ and does not self-correct within six (6) months.
 - a. 2% & annual expenditure for 340B pharmaceuticals
 - b. 5% & annual expenditure for 340B pharmaceuticals
 - c. 2% & 340B expenditure per manufacturer
 - d. 5% & 340B expenditure per manufacturer

31

Resources

Resources available to you!

32

- Apexus 340B University On-Demand **FREE**
 - <https://www.340bpvp.com/education/340b-u-ondemand/>
- “340B The Basics” Video **FREE**
 - *Previously available on Brainshark*
 - *Scroll down the bottom of the page at this link, and view the video “Preview 340B University OnDemand”*
- Apexus Advanced 340B Operations Certificate
 - Fee associated with this course
 - <https://www.apexus.com/340b-certificate-program>
- Relias Online Training – 340B Drug Discount Program FQHCs



Any questions?

33



Please do the one-minute evaluation

<https://www.surveymonkey.com/r/XTM>

(Your responses help us demonstrate to BPHC that
sessions are a valuable use of their funding)

Q&A

As of 2/20/2020