

National Pharmacy and Practice Advancement Priorities

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Learning Objectives

At the completion of this activity, the learner will be able to:

1. List national policy priorities and advocacy efforts for the pharmacy profession.
2. Describe current state and federal regulatory and legislative issues impacting the pharmacy workforce.
3. Identify resources available to support practice advancements and advocacy efforts.

Disclosures

- Anna Legreid Dopp, faculty for this CE activity, has no relevant financial relationship(s) with ineligible companies to disclose.
- The off-label use of medication will not be discussed during this activity.

Topic Areas

Pharmacy Practice Policy Priorities

- Protecting the 340B Drug Pricing Program
- Site-Neutral Payment
- Drug Shortages
- Pharmacist Recognition
- Opioid Use Disorder Treatment

Pharmacy Workforce Priorities

- Well-being and Resilience
- Technician Final Product Verification
- Pharmacy Residency Funding

Pharmacy Practice Policy Priorities



Threats to the 340B Program

- Drug manufacturers and payers are undermining the program and jeopardizing patient services
 - Drug manufacturers are limiting access to drugs and discounts required under the 340B program
 - Payers have attempted to reduce reimbursement for drugs purchased at 340B discount prices and/or keep 340B pharmacies out of networks
- PhRMA-funded ASAP 340B coalition



Protecting the 340B Program

- The House of Representatives **introduced the ASHP-supported legislation** (the PROTECT 340B Act)
 - Bipartisan legislation prohibiting discriminatory policies against 340B providers by a PBM, group health plan, and other entities.
- **ASHP developed model legislation** prohibiting insurers from selectively reducing reimbursement to 340B covered entities
 - Six states passed nondiscrimination legislation
 - Total of 28 states now have 340B nondiscrimination laws



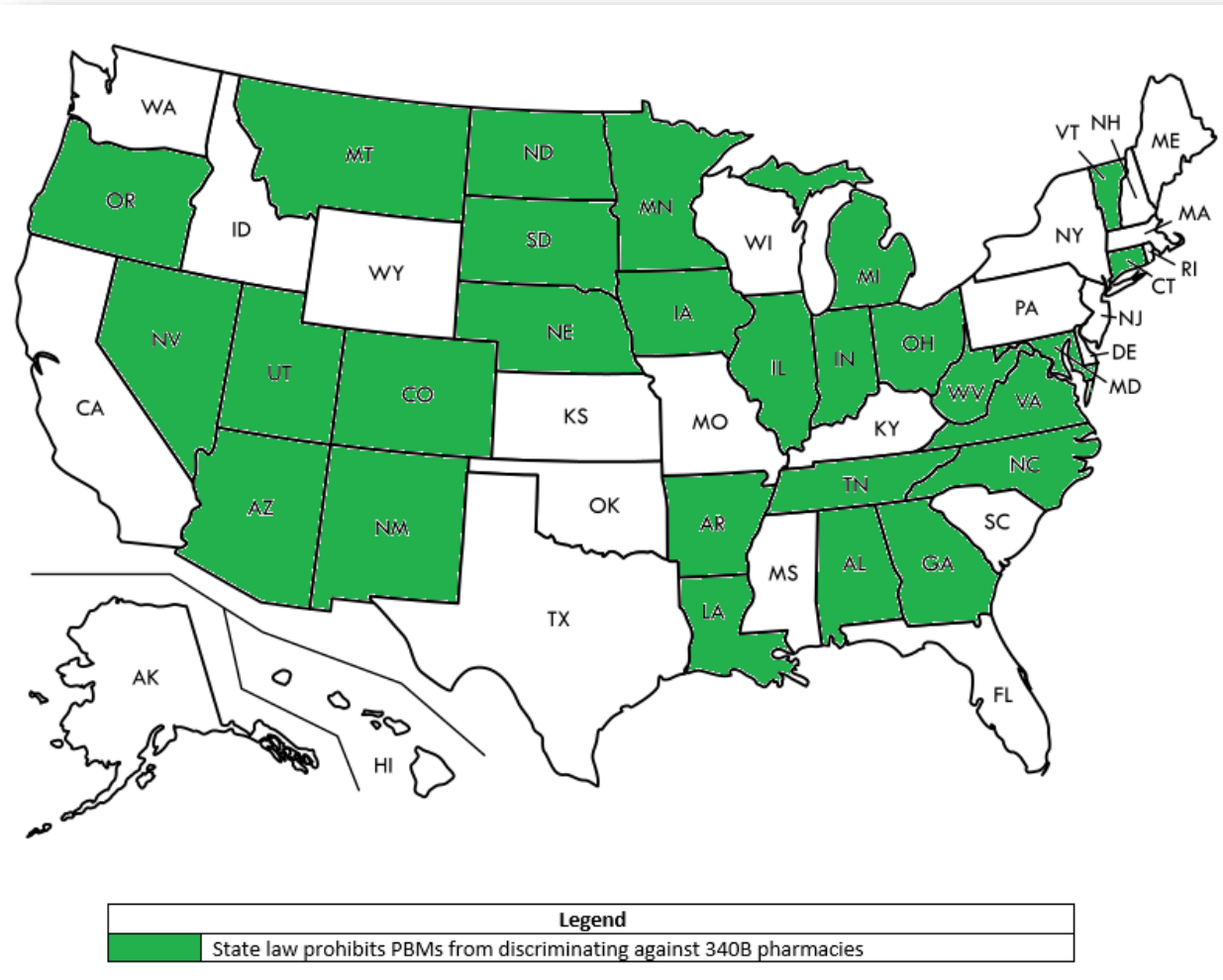
ASHP's Model Legislation Protecting the 340B Program

1. Prohibits differential payment for drugs solely on the basis of 340B status
2. Prohibits PBMs and plans from excluding 340B covered entities from networks
3. Prohibits PBMs and plans from requiring modifiers for non-Medicaid 340B claims

Health systems and state societies can introduce this legislation in their states.



States Prohibiting Discrimination Against 340B Pharmacies



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Think-Pair-Share: What are threats to 340B programs in ND?



Stop Site-Neutral Legislation for Medication Administration

- Partnering with AHA to advocate against harmful site-neutral proposals
- ASHP referenced extensively during Congressional debate
- Senate backing away from House-passed proposal
 - Still at risk due to budget impact

REQUIREMENTS		HOSPITAL	PHYSICIAN OFFICE	FREE-STANDING SITE
SAFE PREPARATION	Clean room with positive air pressure to prevent microbial contamination	✓	✗	✗
	Environmental sampling to ensure sterile conditions	✓	✗	✗
	Drug preparation supervised by a licensed pharmacist	✓	✗	✗
	Employee protections from exposure to hazardous drugs	✓	✗	✗
	Drug Supply Chain Security Act rules prevent use of counterfeit or mishandled drugs	✓	✗	✗
SAFE ADMINISTRATION	Drug barcoding and EHR integration reduce administration errors	✓	✗	✗
	Hospital pharmacist confirms safe dosing and checks for drug-drug interactions	✓	✗	✗
	On-site physician for prompt response to adverse reactions	✓	✓	✗
CARE COORDINATION	On-site pharmacy prevents delays accessing medication	✓	✗	✗
	On-site pharmacy can modify dosing on day of infusion based on therapeutic needs	✓	✗	✗
	Provides care for the most complex patients	✓	✗	✗
	Provides access to care 24 hours per day	✓	✗	✗
	Provides care to uninsured and underinsured patients	✓	✗	✗
SAFETY OVERSIGHT	Food and Drug Administration, state boards of pharmacy, U.S. Pharmacopeia, and The Joint Commission	✓	✗	✗

Medication Shortages

- **New policy recommendations** to address drug shortages
 - Our proposals related to private-sector buffer supply and supply chain reporting are gaining traction
- **Testified** before the House Energy and Commerce Committee regarding shortages
- **White House roundtable** discussion on national shortages in key cancer medications

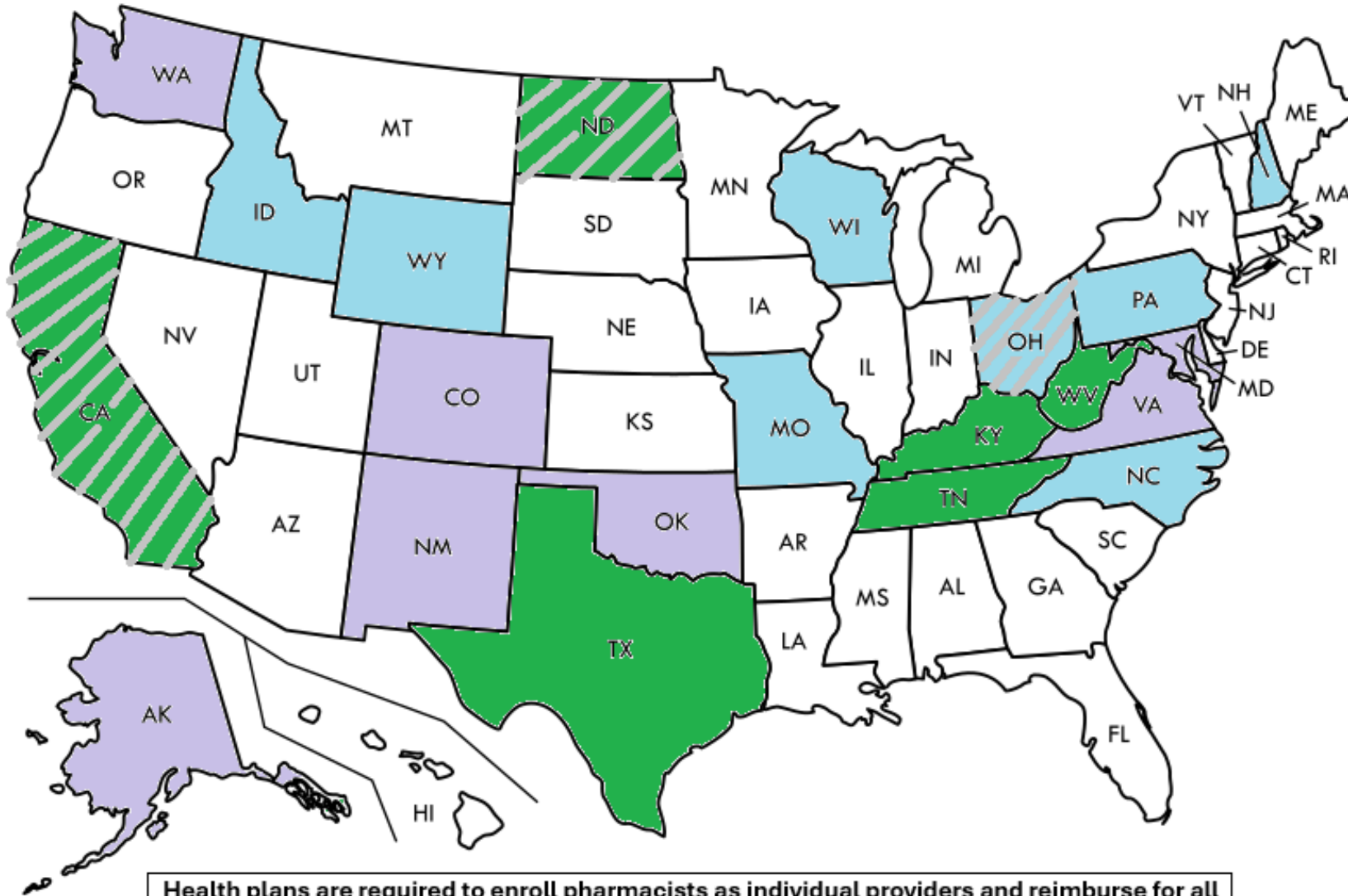


State Pharmacist Recognition

- **Model state legislation** establishing payment for CMM
 - Passed in North Dakota
- **Several states passed legislation** requiring health plans to reimburse pharmacists for clinical services:
 - Virginia, Maryland, Wyoming, North Dakota, California
 - 19 states now require commercial insurance plans, Medicaid plans, or both to reimburse pharmacists for clinical services
- **All 50 states now permit collaborative pharmacy practice**






Pharmacist Provider Status in the States 2024



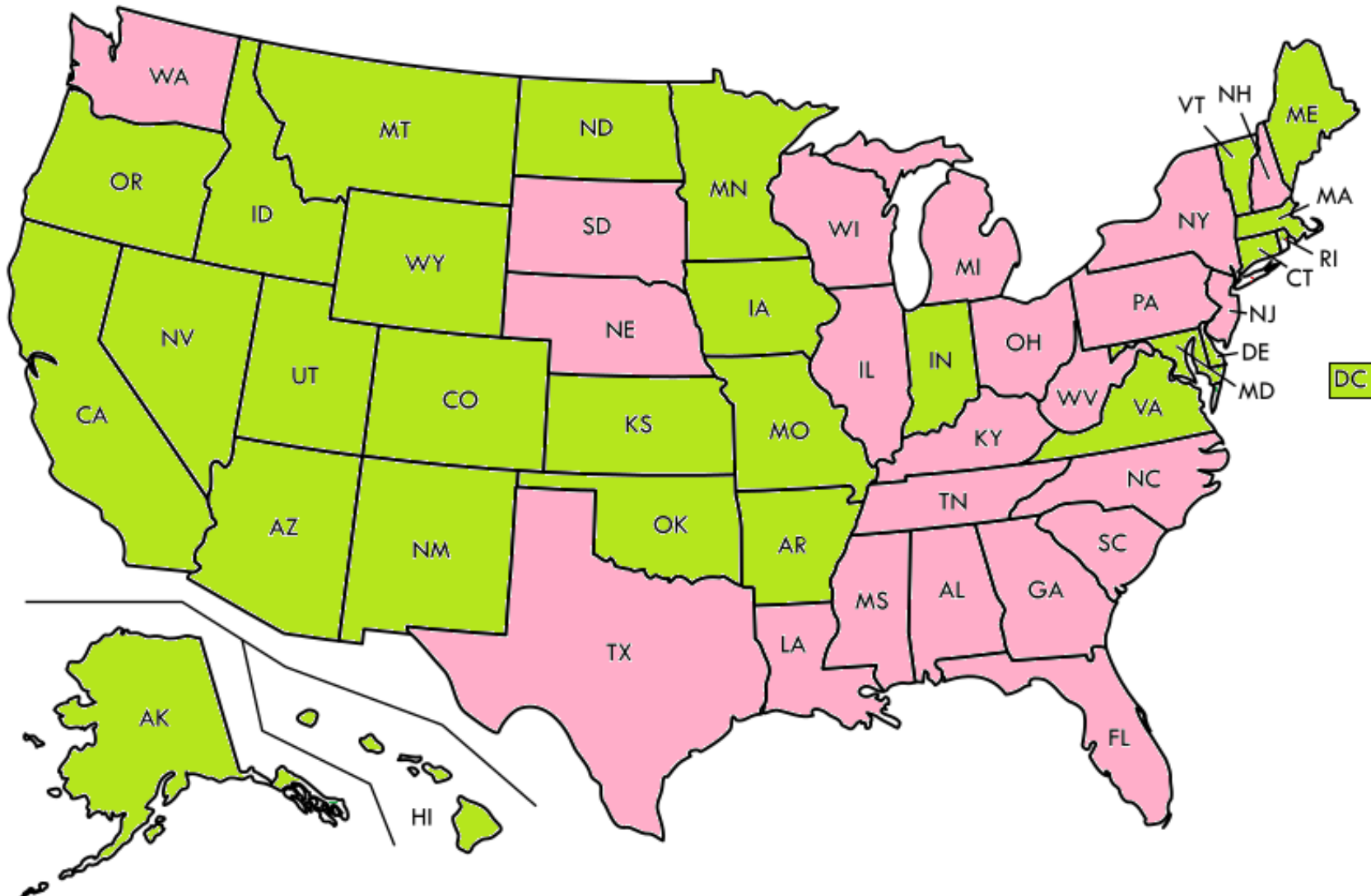
As of February 2024

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Health plans are required to enroll pharmacists as individual providers and reimburse for all covered services within scope of practice	
	Commercial Insurance
	Medicaid
	Both Commercial Insurance and Medicaid



Pharmacist Independent Prescribing Authority



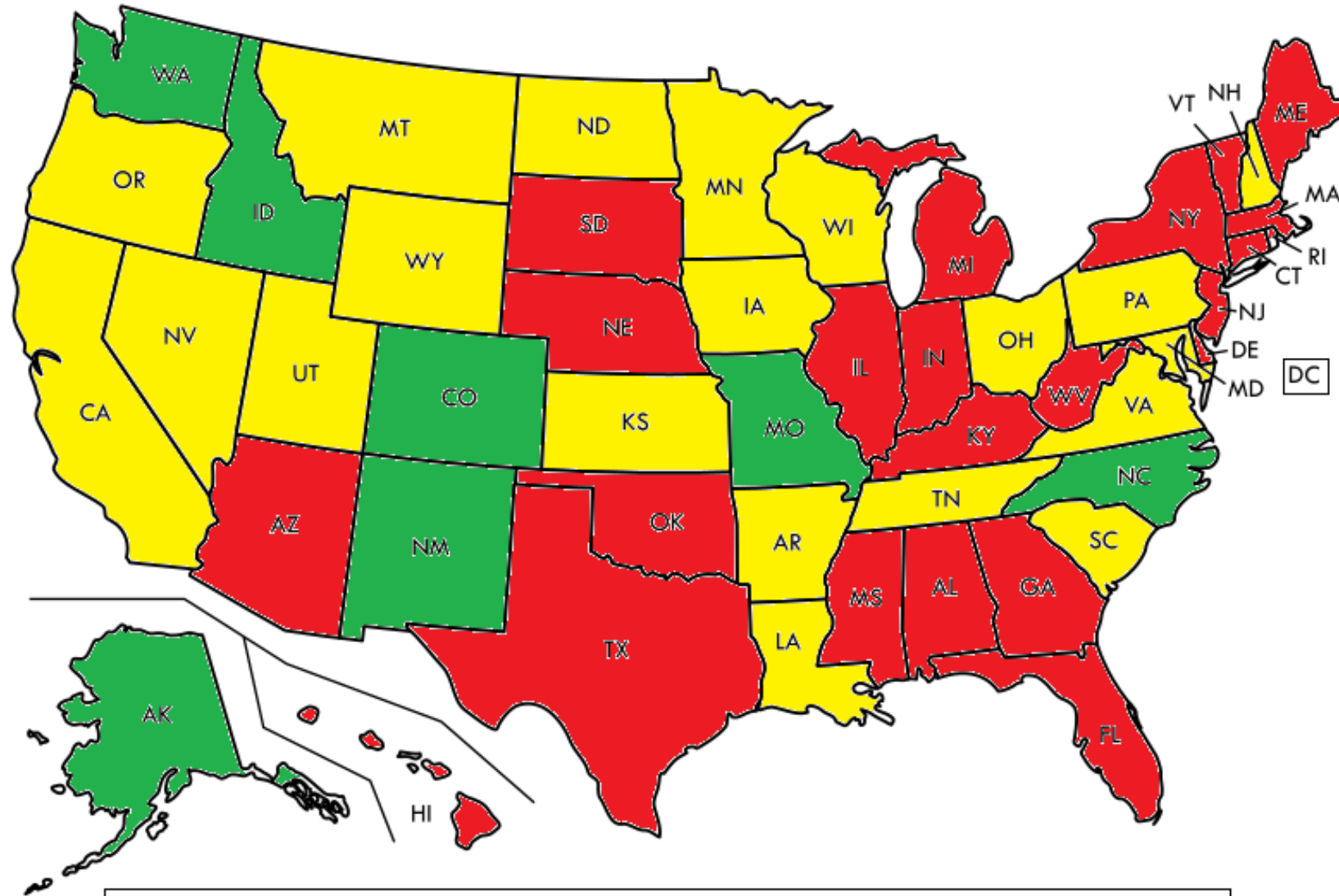
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	Pharmacists permitted to independently prescribe at least one drug or device (not including vaccines)
	Dependent prescribing only



Pharmacist Medicaid Provider Status



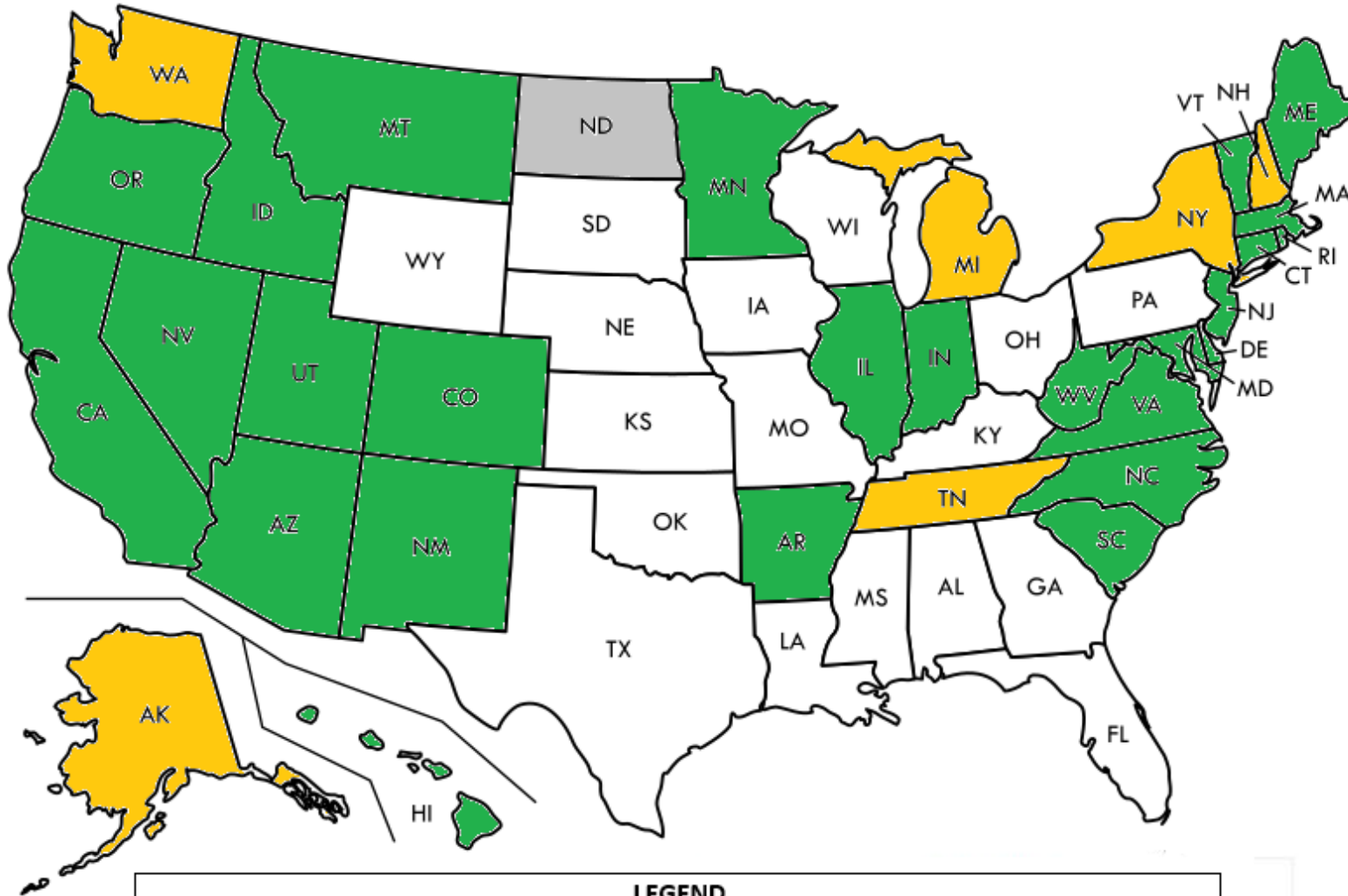
As of February 2024

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Does Medicaid Enroll Pharmacists as Individual Providers?	
■	Pharmacists may enroll as individual providers and independently bill E/M codes 99202-99215
■	Pharmacists may enroll as individual providers with limitations on billable services
■	Pharmacists may not enroll as individual providers



Pharmacist Prescribing: Hormonal Contraceptives



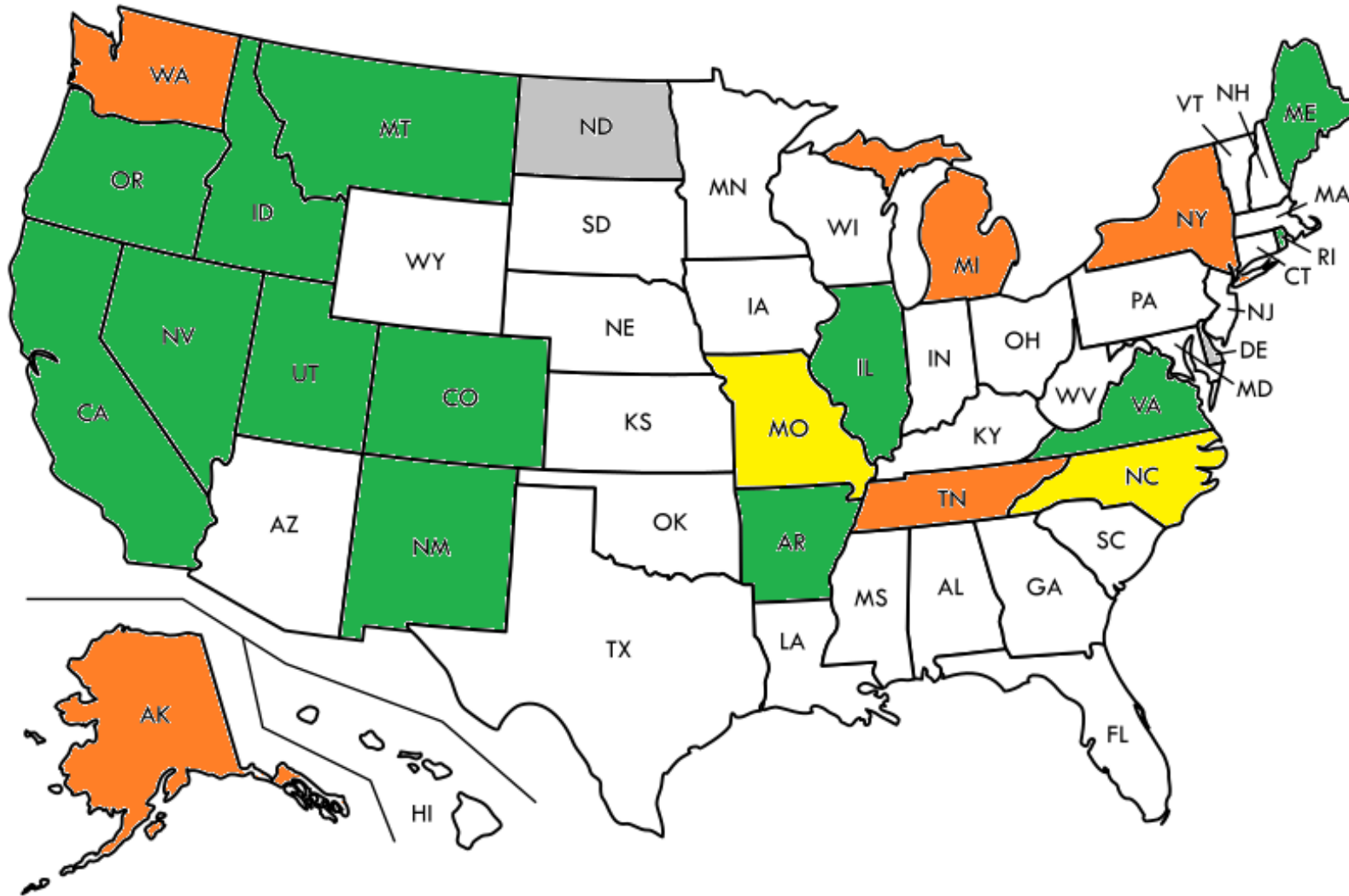
LEGEND	
	Pharmacists may prescribe contraceptives pursuant to a statewide protocol, statewide standing order, or independent prescribing authority
	Pharmacists may prescribe contraceptives pursuant to a non-patient-specific prescriber protocol
	State law permits (but does not require) issuance of a statewide protocol for contraceptive prescribing

As of February 2024

Permission to use from ASHP







Pharmacist Prescribing: Drugs to Prevent HIV Infection



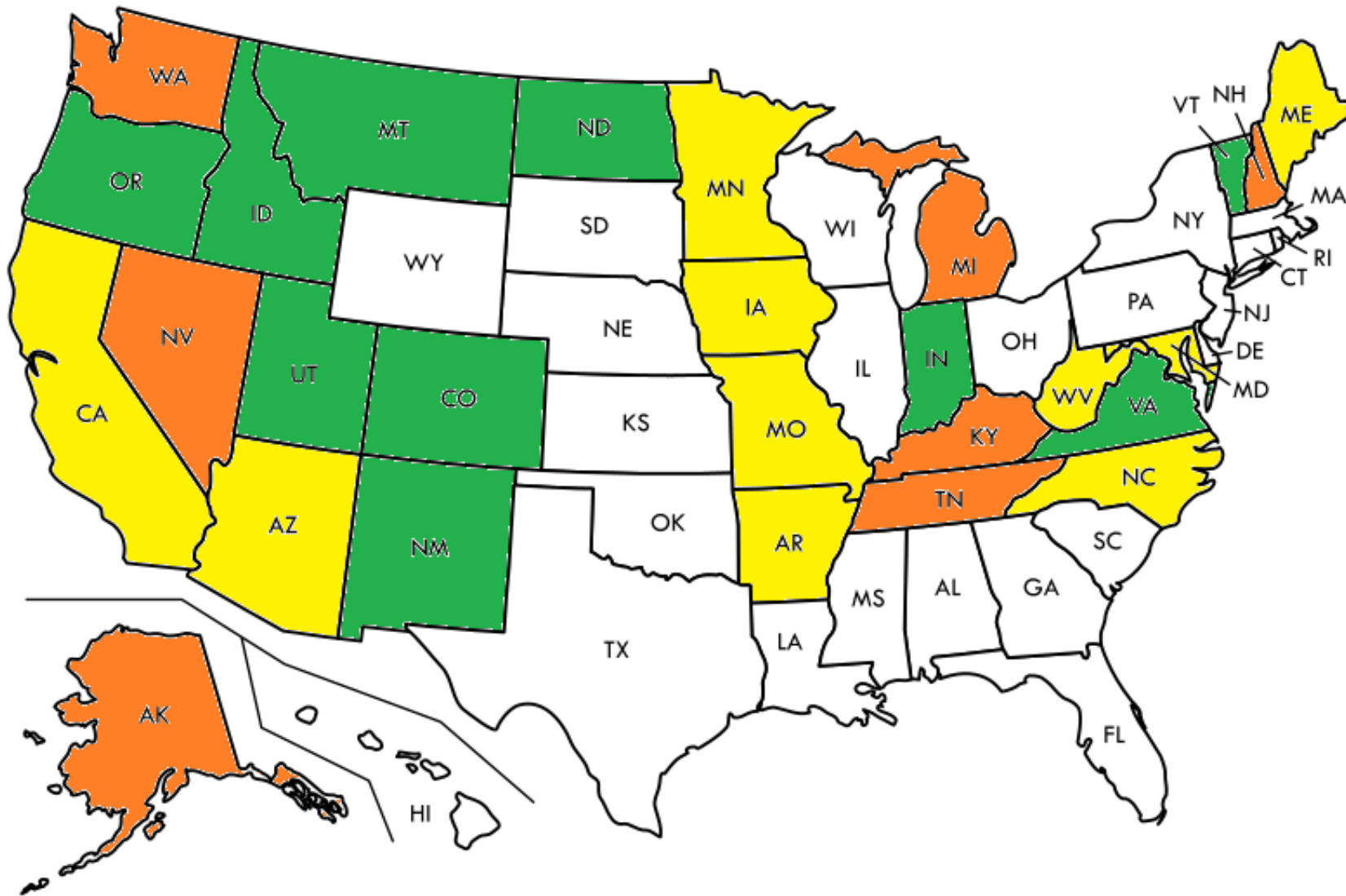
As of February 2024

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LEGEND	
	Pharmacists may independently dispense PEP & PrEP
	Pharmacists may independently dispense PEP only
	Pharmacists may prescribe HIV prevention drugs pursuant to non-patient-specific protocols
	State law permits, but does not require, BOP to issue a statewide protocol for HIV prevention drugs






Pharmacist-Initiated Tobacco Cessation Therapy



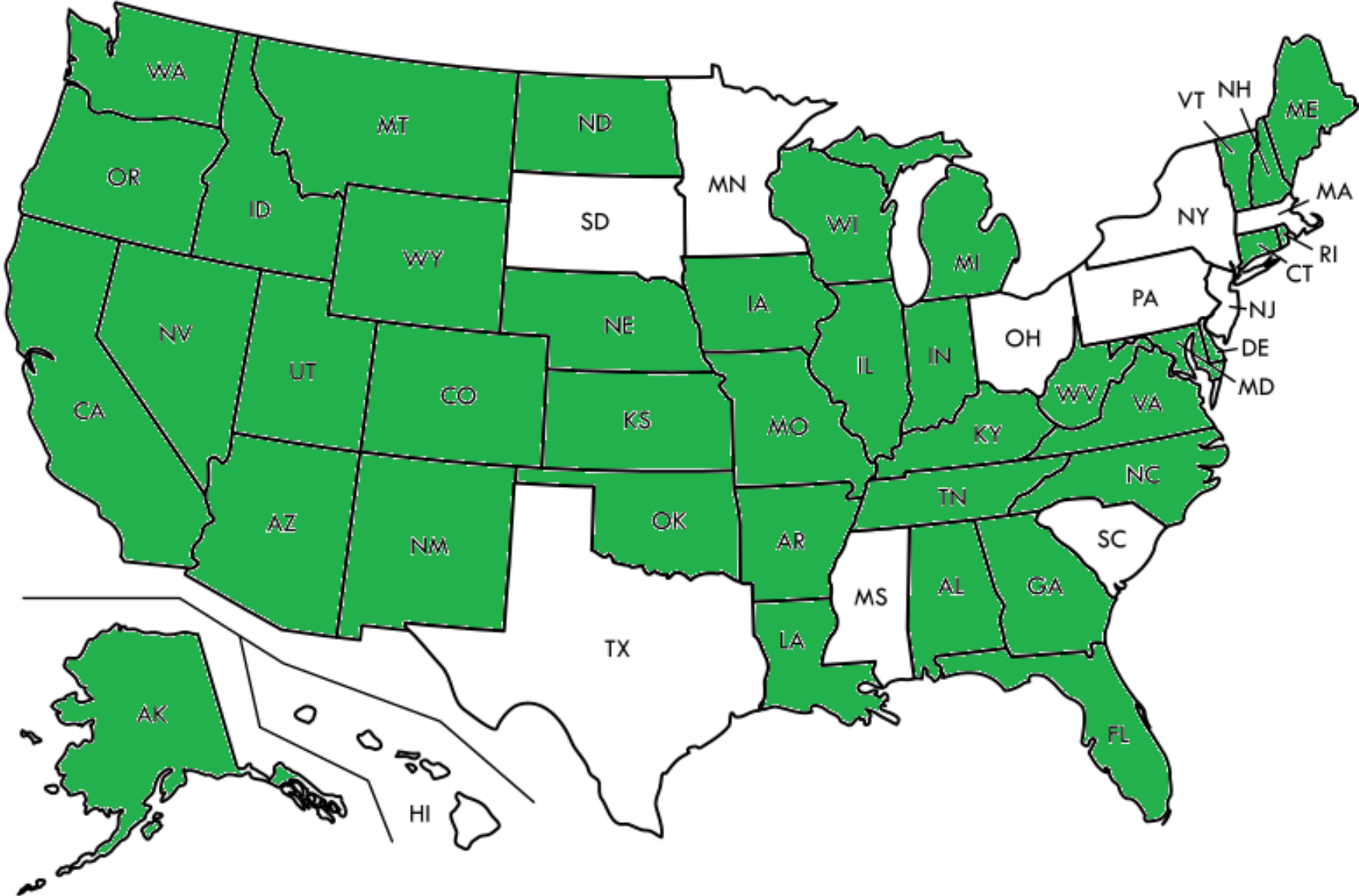
As February 2024

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LEGEND	
	Pharmacists may independently initiate RX drugs for tobacco cessation
	Pharmacists may independently prescribe nicotine replacement therapy only
	Pharmacists may enter into non-patient-specific prescriber protocols for tobacco cessation therapy



Pharmacy Technician Administration of Immunizations



State law permits pharmacy technicians to administer immunizations

As of February 2024

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Think-Pair-Share:
What are opportunities for
pharmacists to expand services in
ND?



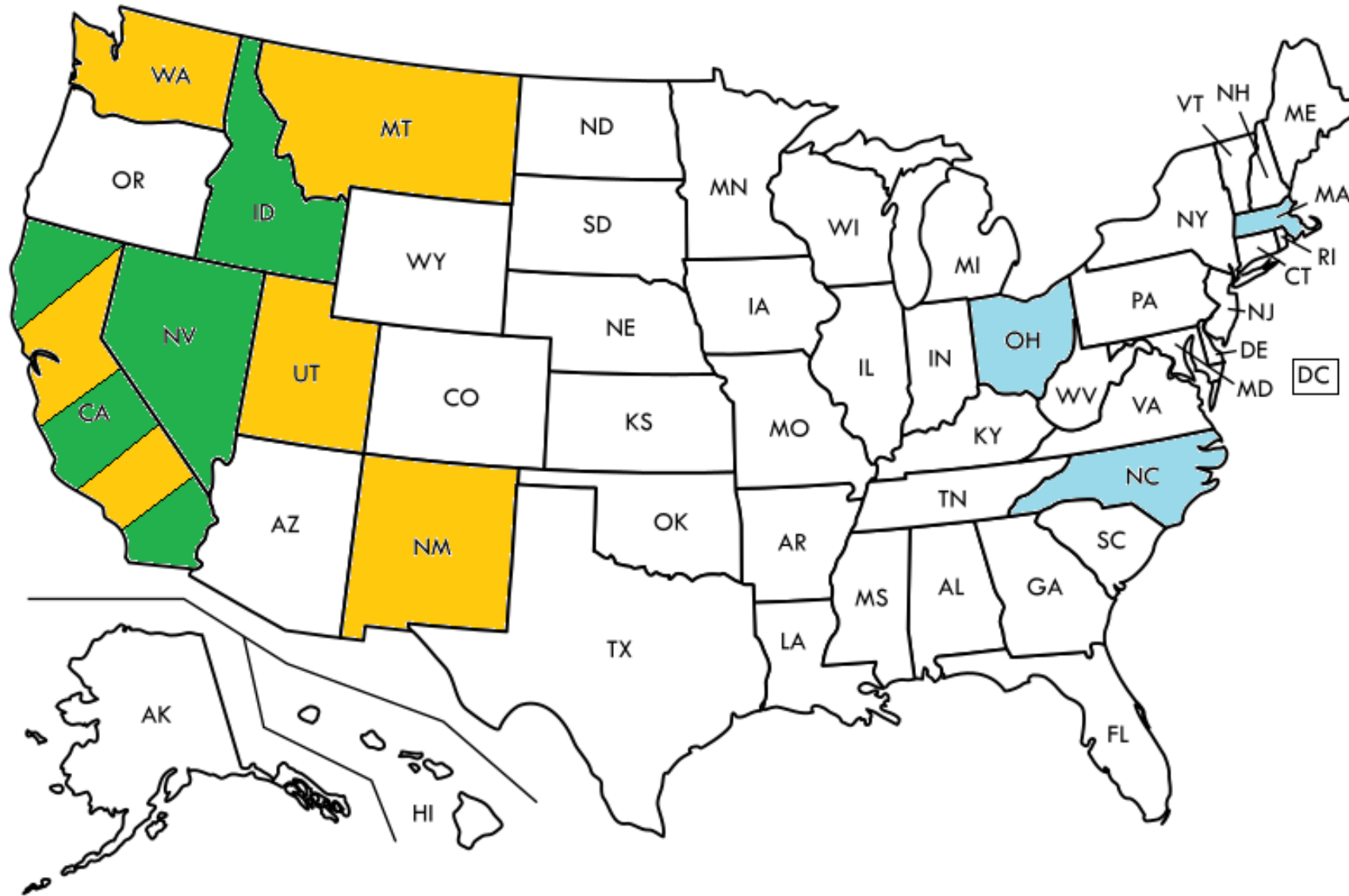
Federal Pharmacist Recognition

- Equitable Community Access to Pharmacist Services Act
 - House
 - 100+ House sponsors
 - Likely legislative hearing in Ways and Means Committee
 - Senate
 - Finance Committee open to inclusion on Part B bill with doc fix
 - Contingent on CBO score

Opioid Use Disorder (OUD) Treatment




- Released model legislation and a model protocol enabling pharmacists to prescribe MOUD
- Nevada authorized pharmacists to prescribe MOUD and plans to reimburse pharmacists for patient assessment and evaluation for OUD
 - 11 states now allow pharmacists to register with DEA as controlled substance prescribers
- Several federal proposals expanding the role of pharmacists in MOUD

Pharmacist Prescribing: Medications for Opioid Use Disorder (MOUD)



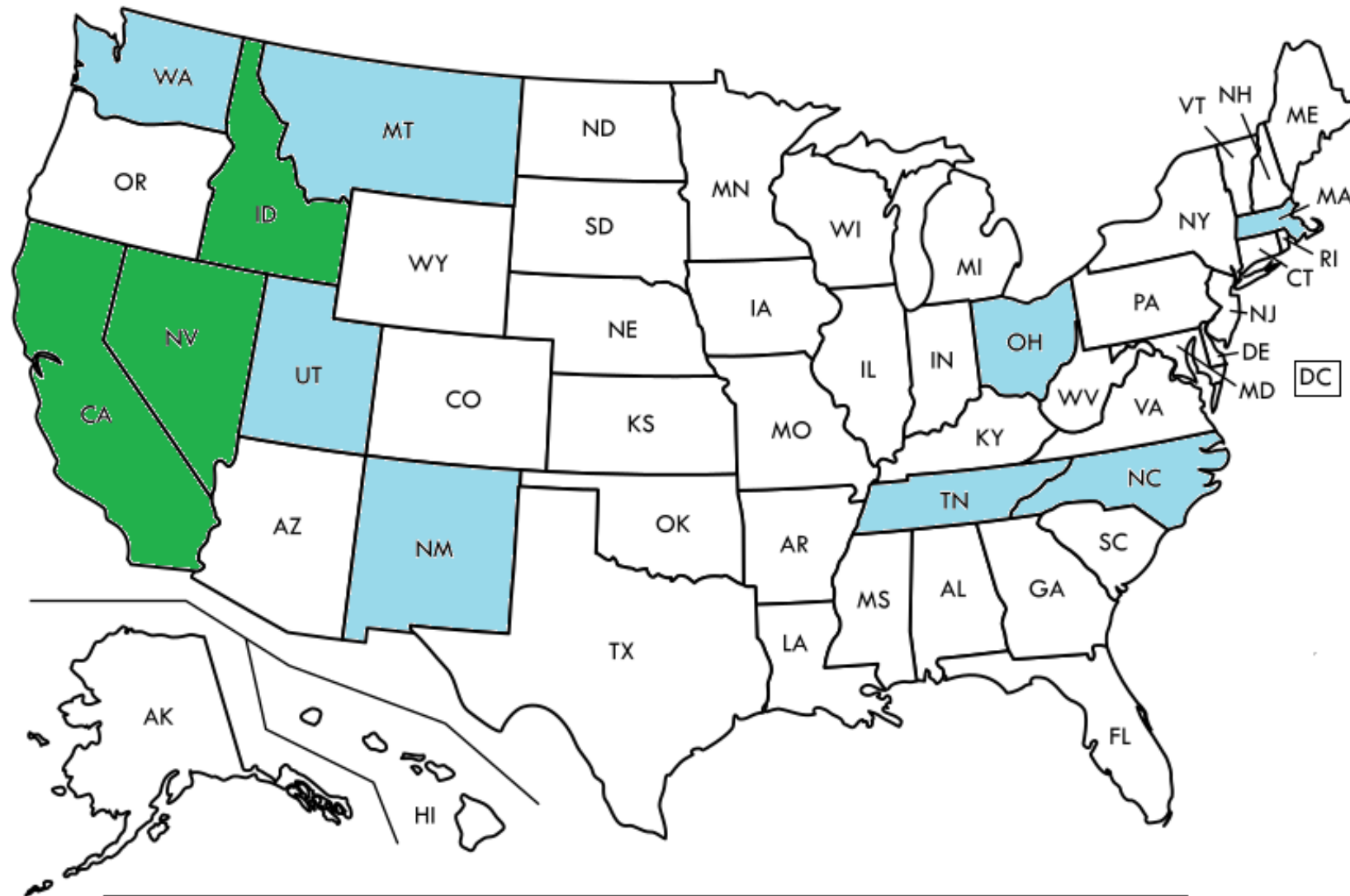
As of February 2024

Permission to use from ASHP

	Pharmacists authorized to independently prescribe MOUD
	Pharmacists may prescribe MOUD pursuant to prescriber protocols
	Pharmacist may prescribe MOUD to established patients upon provider referral





Pharmacist Prescribing: Controlled Substances



As of February 2024

Permission to use from ASHP

	Pharmacists permitted to register with DEA and prescribe controlled substances via collaborative practice
	Pharmacists permitted to register with DEA and independently prescribe controlled substances in certain situations and/or via collaborative practice



Pharmacy Workforce Priorities



Well-Being and Resilience

- Reauthorization of the Dr. Lorna Breen Health Care Provider Protection Reauthorization Act
- Resolution designating March 18 as the Health Workforce Well-Being Day of Awareness
- NIOSH Impact Wellbeing campaign aimed at giving hospital leaders evidence-informed solutions
- Potential policy areas
 - Removing intrusive mental health questions in licensing and credentialing
 - Prior authorization reform
 - AI and EHRs

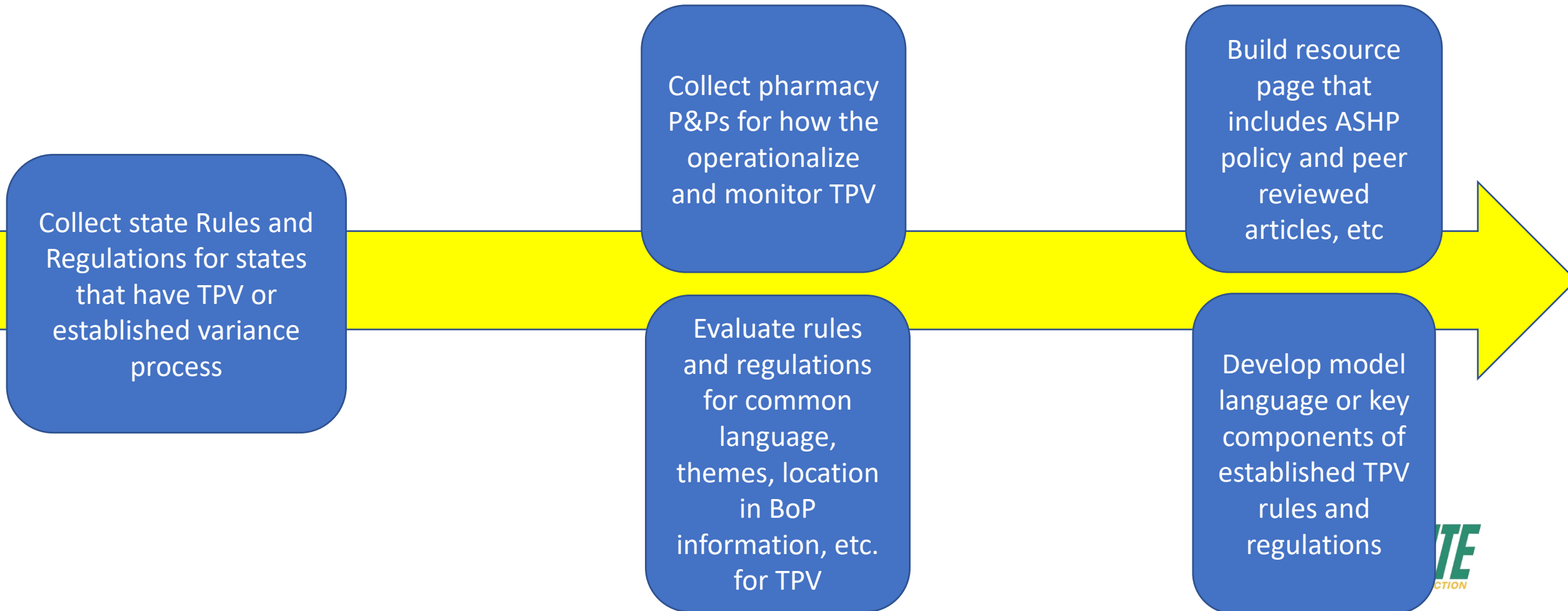


Pharmacy Technician Product Verification

- **Product Verification** – a physical verification that the drug and drug dosage, device or product selected from a pharmacy’s inventory pursuant to the electronic system entry is the correct drug and drug dosage, device or product
 - Product verification is a necessary component of dispensing, inventory management of automated pharmacy systems and unit dose carts, and repacking of medications
 - **Final product verification** must occur before the medication is released to the ultimate user
- **Tech-Check-Tech** is when a second pharmacy technician verifies the work of the first pharmacy technician to perform final product verification

Technician Product Verification (TPV) Initiative

Goal: All 50 states to allow technician product verification



Current TPV Policy Snapshot

- **28 states** affirmatively permit some form of TPV
 - 9 states limit TPV to hospital/institutional settings only
 - Only 16 states permit technicians engage in *final product verification*
- **22 states** do not formally authorize any form of TPV
 - 10 states explicitly prohibit technicians from engaging in final product verification
 - Remaining states are either silent or ambiguous

Key Policy Variations

- Activities Authorized
- Applicable Practice Settings
- Training and Qualifications
- Technology & Documentation Requirements
- Regulator Oversight
- Internal Oversight, Quality Assurance and Continuous Quality Improvement

TPV Opportunities Identified

- Potential pathway to technician specialization and advancement
- Conduit to redeployment of pharmacist resources away from fulfillment and toward cognitive clinical services
- Moving technician scope of practice towards a “standard of care” model that broadly permits technicians to engage in non-discretionary tasks delegated by a pharmacist

ASHP TPV Model Legislation

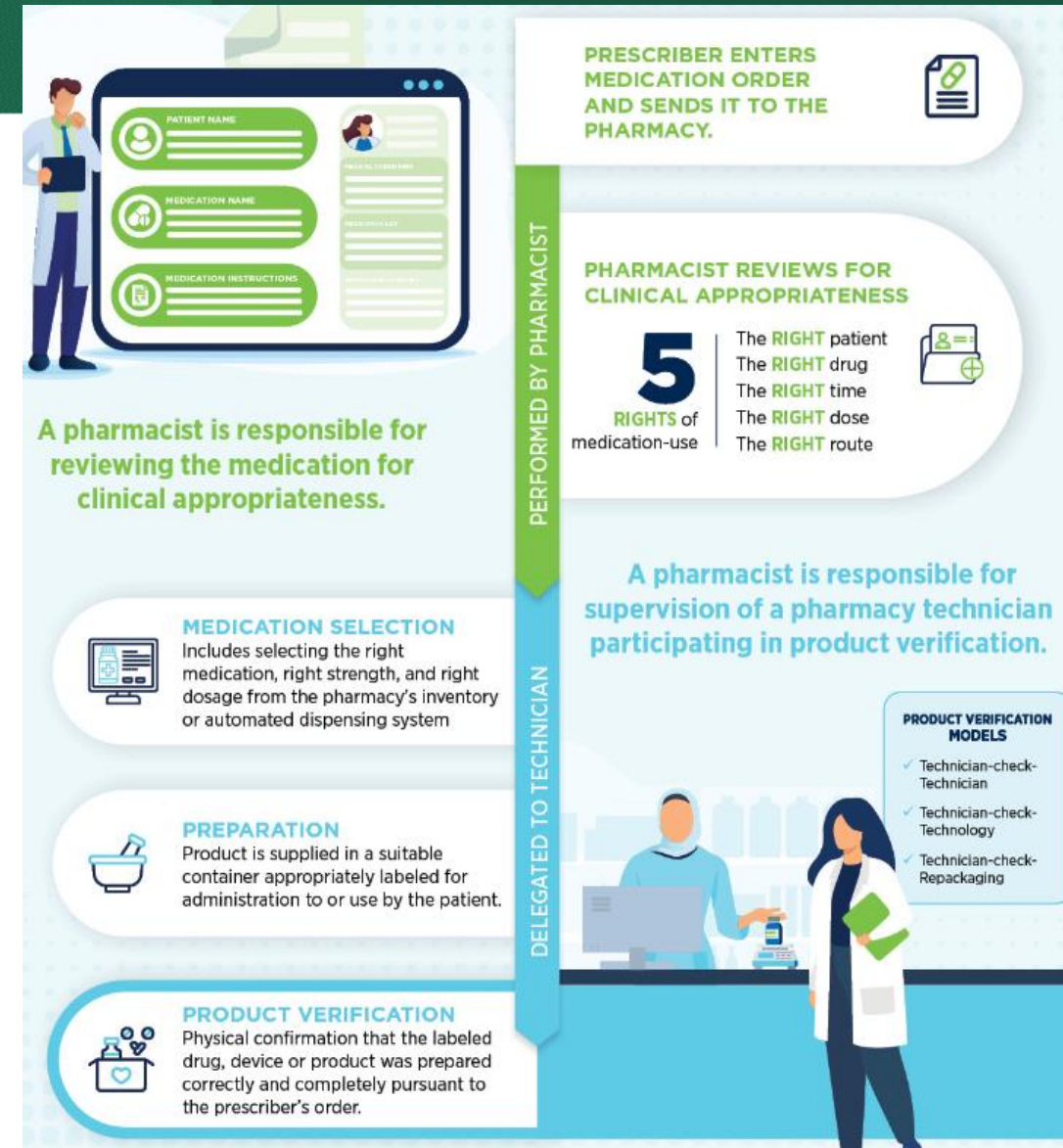
- Defines key terms
- Authorizes pharmacists to delegate, and technicians to perform, product verification tasks
- Establishes training, documentation and quality control requirements for organizations implementing technician product verification
- Authorizes the Board of Pharmacy to make rules as necessary to implement



ASHP TPV Resource Center

Advocacy Resources:

- ASHP Model Legislation
- Infographic
- FAQs & Policy Explainer
- Peer-reviewed research supporting safety of TPV
- CEO Blog & Podcast to be released in coming weeks



Think-Pair-Share: How can TPV
been advanced in ND?



Protect Residency Funding

- ASHP's audit toolkit now available
- ASHP spoke with HHS Secretary and CMS Administrator about threats to pharmacy residency program funding
- Members of congress requested clarification from CMS on program requirements and pause in clawbacks
- Seeking budget rider to force CMS guidance






**PREPARING YOUR PGY1
PROGRAM FOR A CMS AUDIT**

Questions





PAI 2030

Patient-Centered Care 	Pharmacist Role, Education, and Training 	Technology and Data Science 	Pharmacy Technician Role, Education, and Training 	Leadership in Medication Use and Safety 
<ul style="list-style-type: none"> ■ Shift from patient advocacy to patient and family activation ■ Integrate pharmacy enterprise for convenient and cost-effective care ■ Optimize care via pharmacist-provided comprehensive medication management 	<ul style="list-style-type: none"> ■ Increase in the credentialing and privileging of pharmacists in health systems ■ Proliferation of board certification in many practice areas ■ Building of workforce skills in population health management and mental/behavioral health 	<ul style="list-style-type: none"> ■ Harness data analytics to improve patient health ■ Augmented intelligence is an important developing technology that will impact operations and practice ■ Assessing patient care technologies to support optimal medication-use outcomes 	<ul style="list-style-type: none"> ■ Foster development of professional career paths for pharmacy technicians ■ Achieve a recognized scope of practice ■ Advance pharmacy technician roles to improve patient care access 	<ul style="list-style-type: none"> ■ Advance use of pharmacogenomics information and lead medication stewardship activities ■ Increase public health opportunities to address social determinants, chronic illness, and addiction ■ Support the well-being and resiliency of pharmacy workforce

The ASHP Practice Advancement Initiative (PAI) 2030 includes 59 recommendations to promote optimal, safe, and effective medication use; expand pharmacist and technician roles; and implement the latest technologies.

PAI 2030 Focused Initiatives

1. Optimize medication use and access through pharmacist prescribing.
2. Leverage and utilize technology to optimize pharmacist provision of care to patients.
3. Ensure all patients receive seamless and coordinated pharmacy services at all transitions of care.
4. Improve patient access to pharmacist services in ambulatory care clinics.
5. Expand the role of pharmacy technicians.

ACCESS TO SELF-ASSESSMENT TOOL:
<https://pai2030tool.ashp.org/>

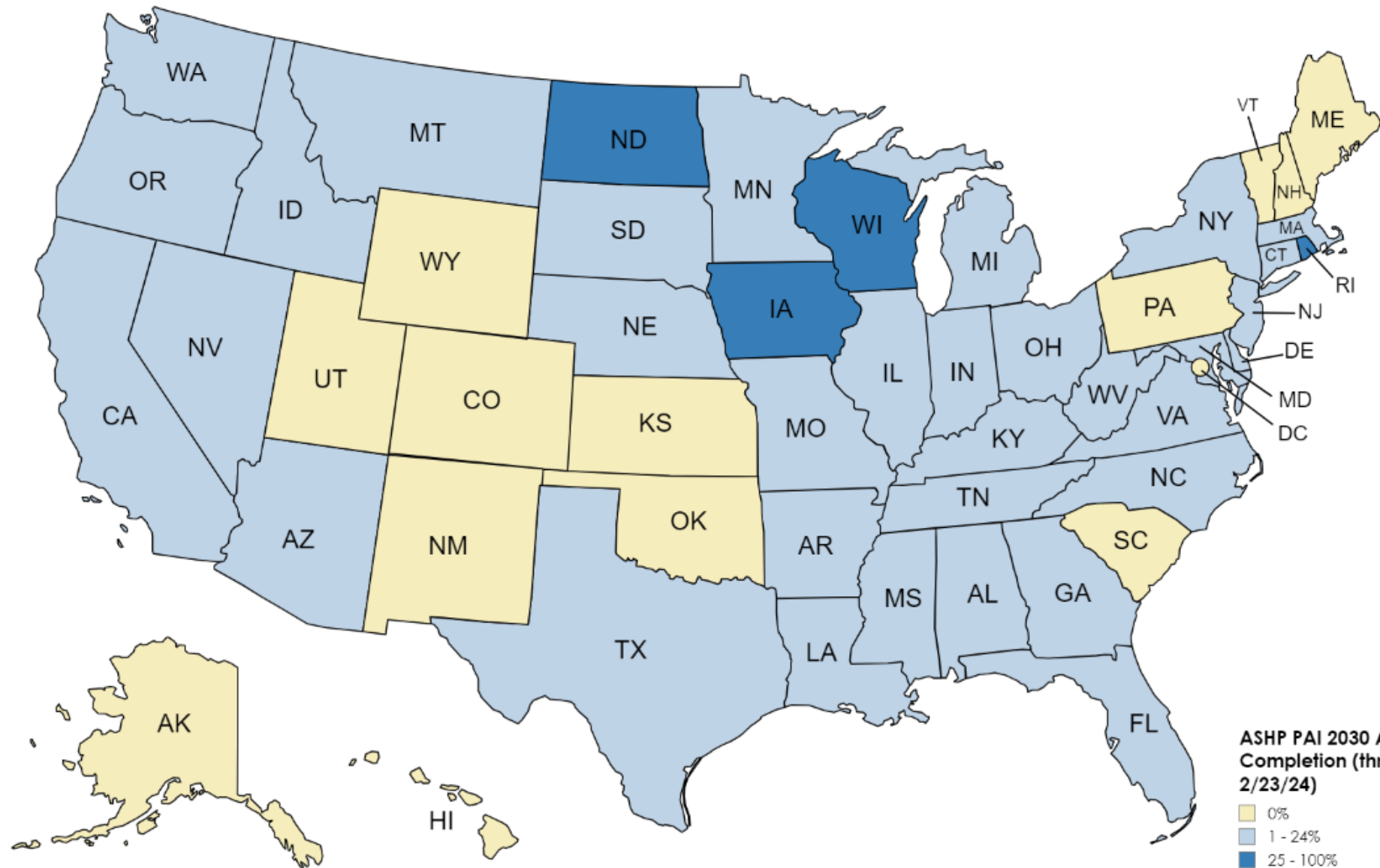
The screenshot shows the 'Overview' page of the PAI 2030 Self-Assessment Tool. At the top, there is the ASHP PAI 2030 logo and the title 'PAI 2030 SELF-ASSESSMENT TOOL'. Below the header is a navigation bar with links for Home, FAQs, PAI 2030 Resource Center, Create Account, and Login. The main content area features an 'Overview' section with text explaining the tool's purpose and how to use it. A 'Getting Started' section at the bottom contains 'Create Account' and 'Login' buttons. An illustration of a pharmacist is visible on the right side of the 'Getting Started' section.

**Tiered Scoring by Domain
& Action Plan**



The screenshot displays the 'Summary & Action Plan' page. At the top, it shows the institution 'Eric's Test Hospital', the completion date 'May 24, 2021', the assessment type 'Personal', and the assessment track 'Practitioner'. Below this is a table of 'Assessment Scores' with a legend for Tier 1 (grey), Tier 2 (orange), Tier 3 (blue), and Tier 4 (green). Five pie charts represent different domains: Part A (Patient-Centered Care, 21%), Part B (Pharmacist Role, Education & Training, 20%), Part C (Technology and Data Science, 21%), Part D (Pharmacy Technician Role, Education, & Training, 11%), and Part E (Leadership in Medication Use & Safety, 100%). A 'Navigation' sidebar on the right includes buttons for 'Summary & Action Plan', 'My Assessment', 'Comparison Report', 'Resources', and 'Blank Assessment'. A large QR code is positioned on the right side of the page. At the bottom, there is an 'Action Plan' section with an 'Update Action Plan' link and a list of recommendations, including 'Recommendation D2: Pharmacy technicians should have complete responsibility for advanced technical and supporting activities...'. A red arrow from the previous page points to this section.





ASHP PAI 2030 Assessment Completion (through 2/23/24)

- 0%
- 1 - 24%
- 25 - 100%



NOTE: Organization/Official



The Pharmacy Technician Society

www.pharmtechsociety.org



Membership Categories

1

Technician Member

Pharmacy Technicians who reside in the United States

2

International Technician Member

Pharmacy Technicians who reside outside the United States

3

Associate Member

Non-technicians who support the mission of TPTS

Resources

Member Center

- TPTS members gain access to valuable benefits such as robust educational offerings, professional development content, and networking and career advancement opportunities.

Education & Training

- We offer a variety of continually expanding tools, education, and professional resources to help pharmacy technicians advance their practice.

Careers

- We offer resources to enhance technician skills and propel their career forward.

Advocacy

- TPTS has a collaborative partnership with ASHP on advocacy efforts for pharmacy technicians. This partnership underscores our shared commitment to drive positive change and amplify our impact on important issues specific to pharmacy technicians.

PharmTechCareers

PharmTechCareers is the premier online job board to help pharmacy technicians and aspiring pharmacy technicians advance their careers and find the right position.



PharmTechCareers

Job Seeker Employer

Home Jobs Your Profile Resources

Help Sign In



PharmTechCareers Account Benefits

Post Your Resume	Apply For Jobs	Get Job Alerts	Get Started!
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Job Listings

602 Job Listings	82 Employers Hiring
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Thank you!

