

# **Skilled Nursing (aka Long-Term Care) Pharmacies**



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Janice Dang, Pharm.D  
Chief of Enforcement



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STATE BOARD  
OF PHARMACY

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# Overview

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- Description
- Type of Patients
- Services Offered
- Applicable Laws
- Issues



# SNF Pharmacy: Description

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- Licensed by the board as a retail pharmacy, license prefix “PHY”
- Specializes in medications management to patients residing at health care facilities (not requiring acute care) and residential facilities.
- Offers services beyond what a community retail pharmacy offers.
- Provide delivery of medications.
- Provide 24-hour availability.
- Offers specialized packaging and dispensing of medications.
- May operate as a “closed door” pharmacy – not accessible to the public
- May be located on the premise of the SNF/ICF



# SNF Pharmacy: Type of Patients

PROVIDES SERVICES TO:	
<ul style="list-style-type: none"><li>• Skilled Nursing Facilities<ul style="list-style-type: none"><li>▶ licensed by CDPH-L&amp;C</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Assisted Living Facilities (ALF) / Residential Care Facilities (RCFE)<ul style="list-style-type: none"><li>▶ licensed by Dept of Social Service Community Care Licensing Division</li></ul></li></ul>
<ul style="list-style-type: none"><li>• Intermediate Care Facilities (ICF-DD, ICF-DDH, ICF-DDN)<ul style="list-style-type: none"><li>▶ licensed by CDPH-L&amp;C</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Board and Care Facilities<ul style="list-style-type: none"><li>▶ licensed by Dept of Social Service</li></ul></li></ul>
<ul style="list-style-type: none"><li>• Hospice Facility<ul style="list-style-type: none"><li>▶ licensed by CDPH-L&amp;C</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Drug Addiction/Treatment Facilities<ul style="list-style-type: none"><li>▶ licensed by DHCS</li></ul></li></ul>
<ul style="list-style-type: none"><li>• Psychiatric Health Facilities<ul style="list-style-type: none"><li>▶ licensed by DHCS</li></ul></li></ul>	
<ul style="list-style-type: none"><li>• Home Health Care (Patient's Home)<ul style="list-style-type: none"><li>▶ licensed by CDPH-L&amp;C</li></ul></li></ul>	



# SNF Pharmacy: Services Provided

## Type of Pharmacy Services Provided to SNF/ICF:

<ul style="list-style-type: none"><li>Prescription management (Cycle Fill; Refill on Demand, Repackaging previous dispensed meds)</li></ul>	<ul style="list-style-type: none"><li>IV Therapy</li></ul>
<ul style="list-style-type: none"><li>Emergency Kits (SNF/ICF)</li></ul>	<ul style="list-style-type: none"><li>Enteral Feeding/Urological and Ostomy Supplies</li></ul>
<ul style="list-style-type: none"><li>Automated Unit Dose System (AUDS)</li></ul>	<ul style="list-style-type: none"><li>OTC House Supply</li></ul>
<ul style="list-style-type: none"><li>Consultant Pharmacist</li></ul>	<ul style="list-style-type: none"><li>Drug Take Back Receptacles for unused or discontinued patient medications</li></ul>
<ul style="list-style-type: none"><li>Consultant Nurse</li></ul>	<ul style="list-style-type: none"><li>Medical Records (chart orders, medication administration records (MAR))</li></ul>



# SNF Pharmacy: Prescription Management

- Cycle Fill  
(Bubble cards, vials, med-dose pack)
- Refill on Demand
- Repackaging previously dispensed medications  
(BPC 4052.7)
- AUDS



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## Issues related to Prescription Management:

### 1. Chart Order versus Prescription

- 22 CCR § 72361 – SNF
- 22 CCR § 73353 – ICF
- Obtaining signed copies

### 2. Dispensing Schedule II Controlled Substances

- BPC 4071 and 4072 – is not considered an agent of the prescriber for Schedule II controlled substances
- BPC 688 – E-RX
- HSC 11164 – Controlled Substance Rx
- HSC 11159.2 - Terminally III
- 21 CFR 1306.13 – Terminally III
- HSC 11167 – Emergency order
- HSC 11167.5 - SNF/ICF/Hospice

# SNF Pharmacy: Prescription Management

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## Issues:

### 3. Dispensing – Time Limitations

- STAT orders
- Anti-infectives and drugs to treat severe pain, nausea, agitation, diarrhea or other severe discomfort

### 4. Labeling

- Patient centered labeling
- Leave Pass Meds when patient temporary leaves the facility

# SNF Pharmacy: Prescription Management





## Issues:

### 5. Billing

- Medicare Part A: Prospective Payment System (PPS) and Per Diem Daily Rate

### 6. Preferential Pricing

- BPC 4380 - 1% walk-in

# SNF Pharmacy: Prescription Management

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# SNF Pharmacy: Emergency Kits

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## SNF and ICF Emergency Kits:

- HSC 1261.5, 1261.6
- BPC 4427.3(b)(2)

## Challenges and Issues:

1. Type of emergency kits
2. Limitation on Number of different drugs and doses
3. Tracking
4. Restocking
5. Billing of doses removed



# SNF Pharmacy: Automated Unit Dose System (AUDS)

## Issues:

1. Applications for licensure requiring a pre-licensure inspection
  - BPC 4427.3(b)(2) – SNF and ICF
  - BPC 4427.65 – Facilities licensed by the state with statutory to provide pharmaceutical services
2. When there's a change in ownership or change in location with the pharmacy, or a change with the physical location of the ADDS, a new application is required including another pre-licensure inspection.
3. Monitoring compliance
4. Reporting of medication errors to the board for errors dispensed by the ADDS.



# SNF Pharmacy: Consultant Pharmacist

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## Consultant Pharmacist:

- Pharmacy Employee versus Independent Contractor
- BPC 4072 – Allows a consultant pharmacist for SNF/ICF to orally or electronically transmit order to the pharmacy.

## Issues:

- CCR 1762 – Unlawful commission/gratuity/rebate if charged at no cost, nominal cost or below reasonable cost.



# SNF Pharmacy: Drug Take Back

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## Issue:

- After 2017, SNF pharmacies can no longer take back unwanted and/or unused medications from SNF/ICF.

## Challenges:

- SNF pharmacies can establish a collection receptacle in a SNF for collection and ultimate disposal of unwanted prescription drugs (CCR 1776.4).
- Surplus Medication Collection and Distribution
- Destroy unused medication in-house witnessed by a pharmacist or nurse.





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# Thank you

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Janice Dang, Pharm.D.

Chief of Enforcement

Email: [Janice.Dang@dca.ca.gov](mailto:Janice.Dang@dca.ca.gov)