

Skilled Nursing (aka Long-Term Care) Pharmacies



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Janice Dang, Pharm.D
Chief of Enforcement

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Overview

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



SNF Pharmacy: Description

- 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:

- **Skilled Nursing Facilities**
▶ licensed by CDPH-L&C

- **Intermediate Care Facilities (ICF-DD, ICF-DDH, ICF-DDN)**
▶ licensed by CDPH-L&C

- **Hospice Facility**
▶ licensed by CDPH-L&C

- **Psychiatric Health Facilities**
▶ licensed by DHCS

- **Home Health Care (Patient's Home)**
▶ licensed by CDPH-L&C

- **Assisted Living Facilities (ALF) / Residential Care Facilities (RCFE)**
▶ licensed by Dept of Social Service Community Care Licensing Division

- **Board and Care Facilities**
▶ licensed by Dept of Social Service

- **Drug Addiction/Treatment Facilities**
▶ licensed by DHCS



SNF Pharmacy: Services Provided

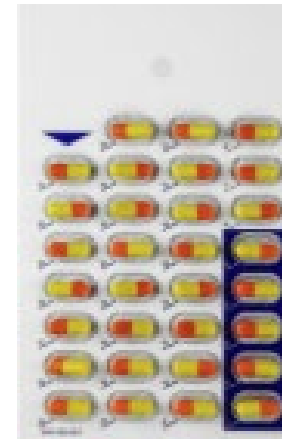
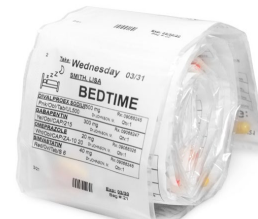
Type of Pharmacy Services Provided to SNF/ICF:

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



SNF Pharmacy: Prescription Management

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



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



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



SNF Pharmacy: Emergency Kits

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

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

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

Janice Dang, Pharm.D.

Chief of Enforcement

Email: Janice.Dang@dca.ca.gov