

WEBINAR ATTENDEE QUESTIONS AND ANSWERS

EPT & Patient Definition

St. Clair County Health Department

Q: Please define eligible patients.

A: Patient definition according to HRSA is an outpatient, and someone the facility is treating on an ongoing basis receiving other forms of help as well. Apexis website provides answers regarding patient definition (website link was provided).

Per Apexis <https://www.340bpvp.com/resource-center/faqs/patient-definition/>: “To be eligible to receive 340B-purchased drugs, patients must receive health care services other than drugs from the 340B covered entity. The only exception is patients of State-operated or -funded AIDS drug purchasing assistance programs. An individual is a patient of a 340B covered entity (with the exception of State-operated or funded AIDS drug purchasing assistance programs) only if:

- The covered entity has established a relationship with the individual, such that the covered entity maintains records of the individual’s health care; *and*
- The individual receives health care services from a health care professional who is either employed by the covered entity or provides health care under contractual or other arrangements (e.g. referral for consultation) such that responsibility for the care provided remains with the covered entity; *and*
- The individual receives a health care service or range of services from the covered entity which is consistent with the service or range of services for which grant funding or Federally-qualified health center look-alike status has been provided to the entity. Disproportionate share hospitals are exempt from this requirement.

An individual will not be considered a patient of the covered entity if the only health care service received by the individual from the covered entity is the dispensing of a drug or drugs for subsequent self-administration or administration in the home setting.

Exception: Individuals registered in a State-operated or funded AIDS Drug Assistance Program (ADAP) that receives Federal Ryan White funding ARE considered patients of the participant ADAP if so registered as eligible by the State program.

Reference: Final Notice Regarding Section 602 of the Veterans Health Care Act of 1992 Patient and Entity Eligibility”

Q: Does this include drugs used for EPT?

A: Everything must fit the patient definition. We are still studying this very intently and will be attending a conference next week where we will be seeking further clarification on this topic. In the meantime, what we are asking you to do in handling this is to record this in the tool.

Any doses regarding EPT need to be indexed back to the covered client. We will provide further clarification on this later but in the mean time continue to capture this data for us.

April Hight

Q: What about EPT?

A: Everything must fit the patient definition. We are still studying this very intently and will be attending a conference next week where we will be seeking further clarification on this topic. In the meantime, what we are asking you to do in handling this is to record this in the tool. Any doses regarding EPT need to be indexed back to the covered client.

Access to Recorded Presentation, Slide Deck, Excel File & Contact Information

Angela Aldrich

Q: When will the power point slides be available after the presentation? Is the presentation available for staff to listen to outside of the two dates/times it is formally being presented? If so, where can it be accessed? Also, how will we gain access to the Excel tracking sheet?

A: The intention is to send out the recording, PowerPoint slides, and the Excel Tool hopefully by the end of this week or early next week.

Tina Sinko

Q: When will we receive the links? And if we have any questions, is the information included for who to contact?

A: The intention is to send out the recording, PowerPoint slides, and the Excel Tool hopefully by the end of this week or early next week. The recorded presentation will be posted to our website.

Sharise Phillips

Q: I apologize if this question was addressed earlier, but will we receive a copy of this PowerPoint? Will there be a special login to access the tool?

A: The intention is to send out the recording, PowerPoint slides, and the Excel Tool hopefully by the end of this week or early next week. There is no required special log in as the spreadsheet will be located locally, not at a State level. The template will be sent out separately and once you have it, the tool is yours to manage. Be mindful of any privacy or HIPAA implications. You will be managing them within your own agency. You will be emailing them monthly then quarterly to us. The tool will be sent out in a week or so after a few adjustments.

Q: Are we submitting to both emails or one or the other?

A: You will be submitting to both emails: MDHHS-HIVSTDoperations@michigan.gov and TrimD@michigan.gov.

Michelle Thorne

Q: Can we get a copy of the slides?

A: The intention is to send out the recording, PowerPoint slides, and the Excel Tool hopefully by the end of this week or early next week. The recorded presentation will be posted to our website.

Which Drugs to Report On

Mary Williams

Q: Are we reporting all 340B drugs or just the STD drugs?

A: For our purposes and from our divisions perspective, you are only tracking the ones we provided in the spreadsheet. If we add new, we will send you a new template with the new medications added. If you are a 340B covered entity and you are getting your own 340B drugs other than ours, we are only interested in ours. We are separating our 340B drugs from any other 340B drugs you may be getting.

Initial Inventory Count

Jennifer Kenney

Q: Are we starting fresh in April? Or do we carry over what we have in house?

A: You are going to do a hard count of what you have on hand that date, and then email it to us to ensure it is filled out correctly.

Sharing Drugs with Other Entities

Bianca Clarke

Q: As a LHD we have been asked to provide Bicillin to outside providers for treating patients with syphilis, how does that scenario work with 340B pricing?

A: The entity that you are providing the 340B medications to need to be another 340B covered entity. You can only share them with other 340B covered entities.

Multiple Lot Numbers

Kristi Villalobos

Q: Can you explain how it works when you have more than one lot of the same drug?

A: The medication should have a lot number on it. You will just record this number. In terms of the initial count, I am not concerned with you recording the lot numbers on hand. If we change our minds on that, we will let you know. For now, just do a hard count for what you have on hand even if it has multiple lot numbers. As you receive new trucks from us, you will get the lot numbers for those new drugs.

Multiple Users for Excel File

Brad Snyder

Q: How do you suggest implementing the use of this spreadsheet by RN's and other providers? I'm anticipating issues with accessing and editing the spreadsheet on our network drive from multiple people at the same time.

A: It all depends on how you are set up. This does not need to be recorded in real time either. It is possible to go back and do this once a day/once a week. I would suggest not getting far behind with that unless you have a system that can mimic our report. Ultimately that is up to you. We are just asking we get a complete report at the previously mentioned intervals.

Satellite Locations

Jean Reynolds

Q: Is it ok to give a dose to a small satellite clinic and how would you account for those doses? Do you need to collect the same client info for those doses? Will we still need to complete the entire quarterly activity report in addition to the new inventory report?

A: The entity that the drugs that are being transferred to need to be a 340B drug covered entity as well. It would work if they are a CE and the person that is receiving the medications fit the patient definition.

Relating to Insured Patients

Iesha Clemons

Q: Is this for all patients including insured?

A: As long as they qualify for 340B drugs, then they would be able to get them through the program. Be mindful that we are not doing duplicate discounts and the patient is not receiving through Medicaid as well.

Q: What are the qualifications for 340B?

A: <https://www.340bpvp.com/resource-center/faqs/patient-definition/>

Doxycycline Dose Splitting

Iesha Clemons

Q: How do we do this when we receive Doxy for 20 capsule doses? How are we splitting it?

A: That is a 340B/HIRSA/Apex question. When you receive inventory that is specific to 14 caps and you have a diagnosis of say Chlamydia then I don't know that I would split a dosage. Because it is specific to a treatment. That is the first I have heard of that. There may need to be a discussion outside of this forum. Please submit information regarding details and we can discuss further.

Julie Groat

Q: How about when we split doxycycline for 20 capsules? The bottles received are 14 capsules?

There are times we are administrating 20 capsules for a 10-day treatment

A: That is a 340B/HIRSA/Apex question. When you receive inventory that is specific to 14 caps and you have a diagnosis of say Chlamydia then I don't know that I would split a dosage. Because it is specific to a treatment. That is the first I have heard of that. There may need to be a discussion outside of this forum. Please submit information regarding details and we can discuss further.

Comment Regarding EMRs

Michelle Thorne

Not a question but a comment, for those of us who have EMRs, it takes a bit to create a report to pull this data out and into the format that you are wanting. Please keep that in mind as you make changes to this report, it is difficult to have to double enter data. So, for those of us with EMRs, we are trying to get this data pulled automatically and some systems may charge a fee for this.

Timing of Entering Information

Nancy

Q: Can individual's treatments be entered in batches or do they need to be entered the same day as the medication is dispensed:

A: You can enter them in batches if ultimately everything gets entered in and there is no missing information. Some health departments have systems that allow them to generate reports

that can essentially mimic our report allowing them to drop the data into our template. It is not necessary to enter the data into the spreadsheet the day you see someone.

Where to Report Data/Send the Tool

Jean

Q: Do we still need to complete the entire quarterly activity report in addition to this report?

A: Currently, continue to submit the quarterly activity report to Danielle Trim.