

# Pennsylvania Pharmacists Association

## Policy Manual

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# **Pennsylvania Pharmacists Association**

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### **Prescription Drug Abuse and Diversion/Controlled Substances**

#### **Fair Employment Practices for the Impaired/Recovered Pharmacist**

The Pennsylvania Pharmacists Association endorses referrals for pharmacists and pharmacy interns who may be impaired to entities recognized by the Board of Pharmacy (i.e. SARPH) for the assessment and where so indicated, the monitoring of compliance with treatment plans.

The Pennsylvania Pharmacists Association supports employment retention of pharmacists and pharmacy students who are compliant with treatment plans monitored by Board recognized entities.

The Pennsylvania Pharmacist Association further supports the hiring of pharmacists and pharmacy interns who have been endorsed by Board recognized entities (i.e. SARPH) as being able to safely return to the practice of pharmacy

*(07/11/1985) (04/12/2007) (05/10/2012) (04/27/2017)*

#### **Good Samaritan Laws**

The Pennsylvania Pharmacists Association supports the concept and enactment of “Good Samaritan” laws specifically as they relate to providing protection from criminal and/or civil liability to anyone who may be in a position to assist a person at risk of overdose.

*(05/08/2014)*

#### **Medical Marijuana**

In some states, medical marijuana is being used as a medication. As such, the Pennsylvania Pharmacists Association affirms that pharmacists should be involved in the legislation, regulation, dispensing and safe use of medical marijuana.

*(05/14/2015)*

#### **Schedule I Drugs**

The Pennsylvania Pharmacists Association asserts that qualified researchers or institutions should be able to design and execute scientifically sound investigations concerning the safety and efficacy of Schedule 1 drugs.

*(05/14/2015)*

#### **Security and Integrity of the Prescription Process**

The Pennsylvania Pharmacists Association encourages physicians, hospitals, and other health care providers to develop systems to ensure security and accountability of the entire prescription process from prescribing to dispensing.

*(01/12/1980) (02/09/2008) (07/29/2013) (05/11/2018)*

#### **Third-Party Administration of Overdose Prevention Medication**

The Pennsylvania Pharmacists Association (PPA) supports enacting third party (i.e. family

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members, facilities, etc.) access to therapies (i.e. Naloxone) that have been deemed safe and effective for third-party administration in the event of an overdose. PPA maintains that the third party should be adequately trained and counseled regarding appropriate medication use and administration. PPA strongly asserts that both prescriber and pharmacist should not be held liable for improper use or administration of such medication by the third party.

*(05/08/2014)*

### **Patient Care and Public Health**

#### **Active Promotion of Patient Adherence**

The Pennsylvania Pharmacists Association shall encourage its members, all other health professionals, and any affected private or governmental body to actively promote patient adherence to medication regimen as a means of promoting better public health. Pharmacists are uniquely positioned to have an influence in this area. As a means to support adherence, pharmacists are encouraged to monitor and identify methods to promote adherence.

*(01/13/1979) (07/20/2007) (05/10/2012) (04/28/2017)*

#### **Basic Life Support (BLS) Certification**

The Pennsylvania Pharmacists Association encourages all pharmacists to become certified in BLS and to maintain their certification through renewal courses as required.

*(07/18/1992) (06/06/2008) (07/29/2013) (05/11/2018)*

#### **Continuing Professional Development**

The Pennsylvania Pharmacists Association supports professional development, a self-directed, individualized, systematic approach to life-long learning, to support pharmacist's efforts to maintain professional competence in their practice.

*(12/01/2016)*

#### **Pharmacist Access to Electronic Medical and Electronic Health Records**

Electronic Medical Records (EMR) and Electronic Health Records (EHR)/Personal Health Record (PHR) are evolving technologies critical to the goals of enhancing patient safety, improving the quality and efficiency of patient care, and reducing overall healthcare costs.

Pharmacists are key members of the healthcare team. Their ability to efficiently identify and resolve drug-related problems relies on access to comprehensive health information beyond medication refill records. PPA urges that pharmacists across all practice settings be able to retrieve and contribute to a patient's electronic health record as needed for the effective management of drug therapy.

*(02/11/2007) (07/26/2012) (04/28/2017)*

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### **Pharmacist Collaboration in Development of Electronic Medical and Electronic Health Records**

The Pennsylvania Pharmacists Association strongly recommends pharmacist representation in any initiative, professional or legislative (including regional health information organizations) charged with the development and/or implementation of electronic health information and its transmission.

Cooperative efforts among all healthcare disciplines in the development of EMR and EHR will ensure a safer and more effective flow of information and, ultimately, improved patient outcomes.  
(04/28/2017)

### **Pharmacists Right of Conscientious Refusal**

The Pennsylvania Pharmacists Association recognizes a patient's right to access legally prescribed therapy while supporting the individual's pharmacist's right to exercise conscientious refusal. The PPA encourages the development of operational guidelines that facilitate the pharmacist's ability to exercise his/her right of conscientious refusal, while balancing the patient's right to obtain legally prescribed medications. Included in these guidelines is the position that any pharmacist making such a claim of conscience or who states an intention to make such a claim of conscience, should not be denied employment for this reason.

(08/04/2005) (11/21/2013) (05/11/2018)

### **Pharmacy Representation on Board and Committees Concerned with Any Phase of Public Health**

The Pennsylvania Pharmacists Association encourages and supports pharmacist representation on all appropriate health boards, medical boards, health teams, committees, and departments concerned with pharmacy, medicine, or any other phase of public health.

(07/08/1974) (12/04/2008) (07/29/2013) (05/11/2018)

### **Recognition of Pharmacists as Health Care Providers**

The Pennsylvania Pharmacists Association feels strongly that pharmacists be recognized in statute regulation and practice as health care providers. The Pennsylvania Pharmacists Association strongly urges that appropriate action to ensure recognition of this provider status be undertaken.

(01/23/1999) (06/06/2008) (07/29/2013) (05/11/2018)

### **Recognition of the Pharmacist's Role in the Prevention and Treatment of All Diseases**

The Pennsylvania Pharmacists Association encourages appropriate action to provide that pharmacists are recognized and reimbursed for providing pharmacist care which improves the management, prevention, and treatment of all diseases.

(07/20/1996) (06/06/2008) (07/29/2013) (05/11/2018)

### **Tobacco Products and Pharmacists**

It is the policy of the Pennsylvania Pharmacists Association to support efforts to curb the use of tobacco products and oppose the sale of tobacco products, particularly in pharmacies. PPA

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supports and encourages pharmacists' involvement in smoking cessation.  
(12/04/2008) (01/26/2014)

### **Pharmacy Practice**

#### **Ability of Pharmacy Student Interns to Practice Immunization**

The Pennsylvania Pharmacists Association advocates for allowing licensed interns, who have completed a state approved training program, to administer medications, biologics and immunizations under the direct supervision of a qualified pharmacist.  
(05/09/2013) (05/11/2018)

#### **Compounding**

The Pennsylvania Pharmacists Association supports that all licensed pharmacists be allowed to compound, as appropriate, to satisfy the medical needs of a particular patient and in compliance with current laws, regulations, and professional standards of practice. We fully support efforts to help improve and enhance pharmacy compounding and patients' access to quality health care.  
(11/30/2007) (07/26/2012) (04/27/2017)

#### **Definition of Compounding**

The Pennsylvania Pharmacists Association endorses the National Association of Board of Pharmacy (NABP) definitions of "compounding".  
(03/19/1992) (08/07/2005) (04/28/2011) (11/19/2015)

#### **Free Choice of Pharmacy Practitioner**

The Pennsylvania Pharmacists Association affirms the right of an individual to the free choice of a pharmacy practitioner. The pharmacists of Pennsylvania shall keep a watchful eye to ensure that the people of the Commonwealth are afforded complete freedom in selection of pharmaceutical services.  
(07/11/1974) (07/20/2007) (07/29/2013) (06/26/2018)

#### **Internet Pharmacies**

The Pennsylvania Pharmacists Association endorses the Verified Internet Pharmacy Practice Sites™ (VIPPS®) program, developed by the National Association Boards of Pharmacy, that is used to identify those online pharmacy practice sites that are appropriately licensed, are legitimately operating via the Internet, and that have successfully completed a rigorous criteria review and inspection through a seal of approval. PPA further opposes the operation of internet pharmacies that do not meet these standards.  
(05/19/2016)

#### **Marketing**

The practice of pharmacy is defined in PA as the provision of health care services by a pharmacist; therefore PPA is opposed to marketing which portrays pharmacies exclusively as a distributor of a drug product and/or diminishes the professional role of the pharmacist. This includes, but is not limited to, marketing that focuses on the dispensing of prescriptions on the basis or guarantee of

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time, offering certain medications for free or lower than typical costs, or other such concepts. PPA believes the profession should be based on value of the service, care, and expertise that a pharmacist provides.

*(09/22/2011) (12/01/2016)*

### **Nominees for State Board of Pharmacy**

The Pennsylvania Pharmacists Association will be involved in the nomination and recommendation of fully qualified and committed candidates from its own specialty and be prepared to submit recommendations to the Board of Directors to consider for nomination by the Governor.

*(01/19/1997) (09/28/2008) (07/29/2013) (06/26/2018)*

### **Pharmacists to Inspect and Audit Pharmacies in the Commonwealth**

The Pennsylvania Pharmacists Association believes that only Pennsylvania licensed pharmacists should be permitted to inspect and audit the pharmacies in the Commonwealth of Pennsylvania.

*(07/08/1974) (05/07/2009) (05/08/2014)*

### **Pharmacy Technicians**

The Pennsylvania Pharmacists Association (PPA) believes that it is appropriate to require statewide registration of pharmacy technicians as a means for tracking and monitoring individuals hired to perform these important assistant functions. However, since the pharmacist remains ultimately responsible for the activities of the pharmacy technicians he/she supervises; requiring licensure of pharmacy technicians is not appropriate or necessary.

The Pennsylvania Pharmacists Association believes that each pharmacy is responsible for ensuring any pharmacy technicians employed in that pharmacy are appropriately trained to perform the expected duties.

The Pennsylvania Pharmacists Association encourages pharmacy technicians to pursue opportunities to further their education and develop their skills.

*(07/13/1982) (05/07/2009) (11/20/2014)*

### **Prescription Distribution Through Mail or Common-Carrier**

The Pennsylvania Pharmacists Association support legislation, state or federal, or other actions, or measures, which impose upon those pharmacy operations devoted primarily to dispensing by mail or common-carrier and delivering prescriptions within the Commonwealth of Pennsylvania the same regulatory requirements currently imposed upon all other pharmacy operations licensed in the Commonwealth of Pennsylvania.

*(07/15/1989) (06/14/2007) (05/10/2012) (11/30/2017)*



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### **Prescription Drugs**

#### **Anti-Discriminatory Drug Pricing Act**

The Pennsylvania Pharmacists Association endorses legislation regarding anti-discriminatory drug pricing in Pennsylvania.

*(03/11/1993) (02/09/2008) (11/21/2013) (06/26/2018)*

#### **Certain OTC Medications to be Dispensed Only by a Pharmacist**

The Pennsylvania Pharmacists Association endorses the concept of a class of OTC medications to be dispensed under the direct supervision of a pharmacist.

*(07/19/1971) (12/04/2008) (07/29/2013)*

#### **Drug Importation**

The Pennsylvania Pharmacists Association opposes the importation of drugs and medical devices that circumvent the Food and Drug Administration approval and inspection processes which ensure product safety and efficacy.

*(05/19/2016)*

#### **Generic Drugs**

The Commonwealth of Pennsylvania modify the current Generic Equivalent Drug Law - Act of 1990, P.L. 509 No.121 as follows:

Allow Pharmacists to substitute a generically equivalent drug "A rated" & listed in the Food and Drug Administration's most current copy of the "Orange Book" for a prescribed brand drug unless indicated by the prescriber or requested otherwise by the patient.

Allow Pharmacists to substitute one manufacturer of a generic equivalent, "A rated" for another manufacture of the same generic equivalent "A rated" on an additional dispensing of a prescription without contacting the prescriber.

Move the administration and enforcement of generic substitution to the Board of Pharmacy from the Department of Health.

*(11/30/2007) (05/10/2012) (11/30/2017)*

#### **National Drug Code Numbers**

It is the position of the Pennsylvania Pharmacists Association that the Food and Drug Administration should require National Drug Codes to be included and easily identifiable on all prescription and non-prescription drug labels.

*(01/18/1991) (02/11/2007) (12/15/2011) (05/19/2016)*

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### **Pill Splitting**

The Pennsylvania Pharmacists Association (PPA) has serious concerns about the universal acceptance of pill-splitting as a matter of policy and/or practice. An FDA-approved medication must pass rigorous testing to insure the integrity of the active compound and its delivery system. Any effort to undermine this process and potentially affect the medication's clinical effectiveness is a breach of professional responsibility to our patients.

However PPA also realizes that for a variety of reasons, including cost and limited available dosage strengths, there may be few realistic alternatives for a patient. Keeping in mind that patient care and adherence to a medication regime is first and foremost, PPA recommends the following always be considered when pill-splitting is deemed necessary:

In all cases, the pharmacist's professional judgment must be considered.

Pill splitting should not be performed on medications deemed inappropriate for pill-splitting. PPA recommends following Institute for Safe Medication Practices (ISMP) guidelines for pill splitting practices.

To maintain continuity of care and consistent work practices, pharmacists should adhere to the following if they are considering splitting pills:

- Tablet splitting be voluntary to patients, prescribers, and pharmacists
- Identify patients for whom tablet splitting would be an acceptable practice
- Encourage and counsel patients who may benefit from the encounter
- Conduct a thorough medication evaluation
- Obtain from the prescriber, a valid prescription for tablets to be split or set up a collaborative agreement with prescribers pre-determining patient eligibility to have tablets split. For example, Prescriber X is comfortable with splitting all prescriptions for statins as long as patient agrees.
- Provide patients with education and follow up as needed
- Split medication PRIOR to dispensing
- Ensure pharmacist is compensated for tablet splitting and counseling.

*(11/30/2007) (05/10/2012) (11/30/2017)*

### **Preferential Pricing**

The Pennsylvania Pharmacists Association opposes preferential pricing practices by pharmaceutical manufacturers and supports a "one-price-for-all" policy. The Pennsylvania Pharmacists Association supports both national and state proposed legislation that prohibit the purchase and resale of drugs at reduced prices by certain non-profit institutions, physicians, and other health care entities. The Pennsylvania Pharmacists Association coordinates its efforts to encourage support of both national and state legislation on preferential pricing.

*(07/11/1987) (08/13/2006) (04/28/2011) (11/19/2015)*

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### **Specialty Pharmacy**

#### **Biosimilars**

The Pennsylvania Pharmacists Association encourages state legislators to follow the standards and guidance as set by the Food and Drug Administration regarding safe and effective biosimilar development, utilization and dispensing.

The dispensing of FDA approved biosimilars should be conducted in a manner that ensures access while avoiding unnecessary and redundant barriers for patients, providers, and payers.

*(05/09/2013) (06/26/2018)*

#### **Restricted Drug Distribution System**

The Pennsylvania Pharmacists Association opposes the practices of mail order “Brown Bagging” and “White Bagging”. Collectively, these practices involve requiring patients and physician offices to transport and store, respectively, various injectable drugs from mail order delivery by a specialty pharmacy to a physician’s office for administration. This practice circumvents the safety provided by a retail pharmacy which uses policies and procedures that are subject to intense regulation.

*(12/01/2016)*

### **Payer/Insurance**

#### **Community Pharmacy Accreditation**

The Pennsylvania Pharmacists Association opposes mandatory accreditation for community pharmacies and making accreditation a requirement for participation in a third-party network.

*(01/23/1999) (07/09/2009) (11/20/2014)*

#### **Condemnation of PBM Practices**

The Pennsylvania Pharmacists Association condemns the following practices; third parties who urge mandatory mail order prescription dispensing and Pharmacy Benefit Managers (PBMs) who urge restrictive provider contracts. The Pennsylvania Pharmacists Association encourages legislation which reflects the intent of this policy.

*(07/02/1984) (12/04/2008) (07/29/2013) (06/26/2018)*

#### **Fair Audit Practice**

The Pennsylvania Pharmacists Association supports fair audit guidelines which include: at least 30 days written notice for an onsite audit, clerical or recordkeeping errors are not considered fraud and not subject to recoupment, the time period covering the audit should not exceed six months and auditing companies may not be paid based on percentage of amount recovered.

*(01/12/1980) (07/09/2009) (11/20/2014)*

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### **Freedom of Choice and Prevention of Copayment Differential between Pharmacy Practice Settings**

The Pennsylvania Pharmacists Association opposes exclusive contracts and copayment differentials as this creates hardships and limits the patient's accessibility to a pharmacy, potentially creating a health hazard to the citizens of the Commonwealth of Pennsylvania.

The Pennsylvania Pharmacists Association supports legislation prohibiting contracts and copayment differentials for any providers of pharmaceutical services thereby allowing the patient's freedom of choice and protecting and promoting the health and welfare of the citizens of the Commonwealth of Pennsylvania.

*(07/09/1988) (09/28/2009) (11/21/2014)*

### **Opposition to Any Tax on Prescriptions**

The Pennsylvania Pharmacists Association opposes any tax which would apply to all prescriptions, including cash and third party prescriptions.

*(01/17/1992) (12/04/2008) (07/29/2013) (06/26/2018)*

### **Opposition to Exclusive Prescription Contracts for Government Employees**

The Pennsylvania Pharmacists Association believes that exclusive/single-source prescription contracts be rescinded and/or prohibited such that all employees affected by such contracts would be permitted to patronize the pharmacy of their choice and such that all pharmacies desiring to participate in such programs would be given the opportunity.

*(01/16/1988) (12/04/2008) (07/29/2013) (06/26/2018)*

### **Payment Transparency**

The Pennsylvania Pharmacists Association supports transparency to pharmacy payments by informing pharmacies at the point of sale what their reimbursement will be for clean claim prescriptions, including, but not limited to, direct and indirect remuneration (DIR) fees imposed by pharmacy benefit managers (PBMs).

*(12/01/2016)*

### **Pharmacist Compensation for Professional and Clinical Services**

The Pennsylvania Pharmacists Association supports adequate compensation for pharmacists relative to professional and clinical services. This may include, but is not limited to, compensation for medication/immunization administration, medication therapy management, disease state management, and patient education services that are not included as part of dispensing reimbursements.

*(11/20/2014)*

### **Pharmacy Benefit Restriction**

The Pennsylvania Pharmacists Association opposes exclusive prescription contracts requiring mandatory mail order dispensing, copayment differentials, and restrictive drug cost containment

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programs, thus depriving the citizens of the Commonwealth of Pennsylvania from patronizing the pharmacy of their choice.

*(07/26/2012) (11/30/2017)*

### **Pharmacist Reimbursement for Medication Dispensing**

The Pennsylvania Pharmacists Association believes that the level of reimbursement in all prescription programs must be established at an equitable level. All prescription programs shall utilize a fair system of reimbursement methodology that appropriately considers and includes the actual prescription medication costs, related operating expenses, a reasonable allowance for profit, and compensation for the professional expertise provided by the pharmacist.

*(05/14/2015)*

### **Prescribers and Other Healthcare Practitioners**

#### **Inclusion of Diagnosis on Prescriptions**

The Pennsylvania Pharmacists Association supports the inclusion of diagnosis on prescriptions for the improvement of patient care.

*(02/05/2005) (04/28/2011) (11/19/2015)*

#### **Physician Dispensing**

The Pennsylvania Pharmacists Association upholds that prescribers should not engage in dispensing drug products to patients or caregivers. Pharmacists are uniquely trained to provide a prospective drug review pursuant to prescriptions being adjudicated. Checks and balances in the health care system are put in place to protect the health and welfare of the patient; to bypass the pharmacist has the potential to negatively impact patient outcomes.

*(05/08/2014)*

## **APPENDIX**

### **Standards of Practice**

- I. PROFESSIONAL COMPETENCE:
  - A. The Pharmacist shall utilize his expertise in assuring the optimal use of therapeutic.
  - B. The Pharmacist shall utilize his expertise in selection and/or preparation of therapeutic agents.
  - C. The Pharmacist shall participate in interprofessional activities to improve health care.
  - D. The Pharmacist shall use his expertise to improve public and individual health in his community.

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- E. The Pharmacist shall maintain his professional competence through the available means of continuing education.
  - F. The Pharmacist shall not promote through public communication any professionally self-laudatory statements calculated to attract patients.
  - G. The Pharmacist shall maintain an extensive and up-to-date drug information library adequate to provide optimal professional services.
  - H. The Pharmacist shall be an active member of county, state, and national pharmacy organizations.
  - I. The Pharmacist must meet his professional and legal responsibilities.
- II. PROFESSIONAL SERVICES:
- A. The Pharmacist has the responsibility of monitoring the patient's therapy.
  - B. The Pharmacist shall maintain surveillance of patient drug usage to maximize compliance and minimize misuse.
  - C. The Pharmacist shall maintain and utilize a system of medication records for his patient.
  - D. The Pharmacist shall provide information and consultation to assure proper drug utilization.
  - E. The Pharmacist shall participate in the education of the pharmacy student.
  - F. The Pharmacist shall encourage young people to enter health care professions.