

## Comments on Local Pharmaceutical Assistance Program

### Standards of Care

#	Item	Comment	DSHS Response	Resolution
1	Definition “period of time.”	This is vague and needs a definition of “period of time”.	HRSA Definition. State does not want to define as this should be a local decision written in the LPAP Program policies.	
2	Limitations: Clients cannot be enrolled in another medication co- payment assistance program.	This needs to be clarified. Is this about the client or the medication? The way it is written this is specific to a client and not specific to a medication.	Reword to: Clients cannot be enrolled in another medication assistance program for the same medication, excluding co-payment discounts.	
3	<ul style="list-style-type: none"> <li>A single occurrence of short duration (an emergency)</li> </ul>	Short duration should be definted.	State does not want to define as this should be a local decision written in the LPAP Program policies.	
4	Services LPAP can be used to assist individuals who	If the client has insurance and is needing assistance with co-pays wouldn't insurance assistance be	Change wording to : LPAP can be used to fund dispensing fees associated with	

	have third party insurance but need assistance with co-payments for medications listed in ADAP/LPAP formulary.	utilized before LPAP?	ADAP/LPAP medications.	
	Each LPAP is to establish a LPAP Board that will develop a formulary that meets the needs of the jurisdiction.	Is this agency level or AA?	DSHS will establish a LPAP for all areas currently not covered by a local LPAP board	
	Confidentiality statement signed by pharmacy employees.	How will I track any of this when using local pharmacies?	Ask the pharmacist if all of the staff have signed confidentiality statements. This should be their pharmacy policy.	
5	It is preferable that LPAP medication be purchased at the lowest possible cost, preferably 340B Program	Is it not a requirement that the lowest possible price be paid? As written, this looks optional. Preferably is used in the same sentence. Thought it had to be 340B pricing or better.	Since we are unable to obtain what the 340B pricing actually is, it is preferred that the purchase is near this amount.  Can reword to: LPAP medication should be purchased at the	

			lowest possible cost, preferably 340B Program pricing.	
	-A drug distribution system that includes a drug formulary approved by the LPAP Board or a subcommittee of a Planning Council/ADAP Advisory Board	??	LPAP program must include this system which includes the drug formulary approved by the LPAP Board	
6	LPAP can pay for over-the-counter medications if	Should reference if the OTC medication is on the formulary.	Change wording to: Over-the-Counter medications to include vitamins may be purchased with LPAP funds if the medication is listed on the LPAP formulary and the provider has deemed that the medication is needed for prevention and treatment of opportunistic infections or to prevent the serious deterioration of health.	
	Clients must have been denied ADAP to be eligible	Clarity is needed since the local formulary may be broader than the ADAP formulary. Clients	Change to:  Clients must have successfully completed	

	for LPAP.	wouldn't necessarily apply for ADAP if the medication isn't on the ADAP formulary.	ADAP application and requisite re-certifications to be eligible for LPAP. Eligibility for LPAP will be determined by eligibility staff and documentation will be kept on file in the primary client record system.	
	Ryan White Part B funds can be used to supplement approved state-operated pharmaceutical payment programs, like Medication Plus Program, only if adhering to the state AIDS Pharmaceutical Assistance (APA) co-pay sliding scale guidelines.	Unsure what this is referring to. Needs to be further referenced.	Need help with response Is APA the same as THMP?	
	Before assistance is provided there should be	Clarity is needed since the local formulary may be broader than the ADAP formulary. Clients	??	

	written documentation in the client's file that ADAP was denied and	wouldn't necessarily apply for ADAP if the medication isn't on the ADAP formulary.		
	As such,	Recommend striking "as such".	Will delete	
	TMHP	AFAP and THMP appear to be used interchangeably. Recommend consistent use to avoid confusion	Do you mean APA?	
	Clients who are having trouble paying medication deductibles or co-payments should be referred to the Medication Reimbursement Initiative.	Recommend referencing since staff may not be familiar.	Delete reference to Medication Reimbursement Initiative	
	Agencies may charge clients co-payment for medication based on an established sliding fee scale.	For clients above 100% FPL.	Is the comment asking us to add for clients above 100% FPL?	
	-Implement a system for	This may not be feasible or cost effective.	We may be able to delete as the next bullet states:	

	clients to access prescriptions twenty-four (24) hours/day	There is only one local pharmacy chain that is 24 hour and it is definitely not the most cost effective	-Provide mechanisms for urgent and/or emergency care.	
	<ul style="list-style-type: none"> <li>• Provider should process prescription for approval within two (2) business days</li> </ul>	Use of the word “approval” needs to be explained. What is approval?	Reworded to: Determine amount of time between ordering of the medication by the provider and prescription availability to the client.	