

Louisiana Independent Pharmacies Association

What's New and What to Watch

LIPA Newsletter:

Bringing you the latest news and information concerning independent pharmacies and the profession at-large....



LIPA Board Meeting and ULM Homecoming Tailgate This Evening

LIPA staff members Randal Johnson and Donaldson Caffery are in Monroe today as LIPA will be co-hosting along with LWD the annual pharmacist tailgate on Friday night, in advance of the ULM Homecoming football game tomorrow, October 23rd. At 5 PM, the LIPA Board will be meeting at the ULM College of Pharmacy and via Zoom to discuss the myriad of issues impacting independent pharmacies, including activities at LDH, Medicaid and LDI as well as important matters for possible consideration by Congress and federal agencies and within the State of Louisiana.

At Long Last—Moderna Booster Shots Can Now Be Administered!

LDH sent out their official [Health Alert Network \(HAN\) memo](#) at 11:26 A.M. this morning, authorizing COVID vaccine providers in Louisiana to begin administering Moderna COVID vaccine boosters effective immediately. For individuals who received either Pfizer **or Moderna COVID-19 vaccine**, the following groups are eligible for a booster shot at 6 months or more after their initial series:

- 65 years and older
- Age 18+ who live in [long-term care settings](#)
- Age 18+ who have [underlying medical conditions](#)
- Age 18+ who work or live in [high-risk settings](#)
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For the nearly 15 million people who got the **Johnson & Johnson COVID-19 vaccine**, booster shots are also recommended for those who are:

- 18 and older and
- who were vaccinated two or more months ago.

Eligible individuals may choose which vaccine they receive as a booster dose. Some people may have a preference for the vaccine type that they originally received and others, may prefer to get a different booster. CDC's recommendations now allow for this type of mix-and-match dosing for booster shots.

Here is the link to LDH's [news release](#) regarding COVID boosters.

LINKS Input for Moderna .25 mL Booster Doses

LDH's Immunization Program has created a one pager with instructions for inputting the half doses (.25 mL) of Moderna COVID vaccine in LINKS. [Here is the link:](#)

COVID Vaccine Clinical Considerations and Links to Updated Provider Fact Sheets

Each of the three COVID Vaccine Fact Sheets for Providers have been updated to reflect booster clinical information.

Moderna A single booster (half) dose of the Moderna COVID-19 Vaccine (0.25 mL) may be administered as a heterologous booster dose following completion of primary vaccination with another authorized or approved COVID-19 vaccine. The eligible population(s) and dosing interval for the heterologous booster dose are the same as those authorized for a booster dose of the vaccine used for primary vaccination. [Moderna Fact Sheet](#)

Johnson & Johnson (Janssen) A single Janssen COVID-19 Vaccine booster dose (0.5 mL) may be administered at least 2 months after primary vaccination with the Janssen COVID-19 Vaccine, to individuals 18 years of age and older.

A single booster dose of the Janssen COVID-19 Vaccine (0.5 mL) may be administered as a heterologous booster dose following completion of primary vaccination with another authorized or approved COVID-19 vaccine. The eligible population(s) and dosing interval for the heterologous booster dose are the same as those authorized for a booster dose of the vaccine used for primary vaccination. [Johnson & Johnson Fact Sheet](#)

Pfizer A single booster dose of the Pfizer-BioNTech COVID-19 Vaccine (0.3 mL) may be administered as a heterologous booster dose following completion of primary vaccination with another authorized COVID-19 vaccine. The eligible population(s) and dosing interval for the heterologous booster dose are the same as those authorized for a booster dose of the vaccine used for primary vaccination. [Pfizer Fact Sheet](#)

“Mix and Match” COVID Vaccine Additional Details

A single booster dose of any of the available COVID-19 vaccines may be administered as a heterologous booster dose following completion of primary vaccination with a different available COVID-19 vaccine. The eligible population(s) and dosing interval for a heterologous booster dose are the same as those authorized for a booster dose of the vaccine used for primary vaccination.

For example, Janssen COVID-19 Vaccine recipients 18 years of age and older may receive a single booster dose of Janssen COVID-19 Vaccine, Moderna COVID-19 Vaccine (half dose) or Pfizer-BioNTech COVID-19 Vaccine at least two months after receiving their Janssen COVID-19 Vaccine primary vaccination.

In another example, Moderna COVID-19 Vaccine and Pfizer-BioNTech COVID-19 vaccine recipients falling into one of the authorized categories for boosters (65 years of age and older, 18 through 64 years of age at high-risk of severe COVID-19, and 18 through 64 years of age with frequent institutional or occupational exposure to SARS-CoV-2) may receive a booster dose of Moderna COVID-19 Vaccine (half dose), Pfizer-BioNTech COVID-19 Vaccine or Janssen COVID-19 Vaccine at least six months after completing their primary vaccination.

Planning for Pfizer Vaccine for Pediatric Patients Ages 5-11

At this time, planning—including **special pediatric COVID vaccine ordering**—is already underway in Louisiana in anticipation of FDA, CDC, and LDH approval coming the end of the first week of November to administer Pfizer COVID vaccine to pediatric patients age 5-11. Pfizer’s configuration, packaging, storage, and the NDC will all be **different** for pediatric COVID vaccine. It is **not** appropriate to administer a lower dosage of Pfizer vaccine for adults and adolescents to children ages 5-11.

LDH has asked for LIPA’s help in getting an idea of the number of independent pharmacies that plan to place orders for pediatric Pfizer vaccine and assist with getting children ages 5-11 immunized. We know that not all of our independent pharmacies are in a position to provide vaccines to this age group but based on early survey results, a number of independent pharmacies are planning to offer vaccines. Here is a link to the survey that can be completed in just a couple of minutes if you have not already done so: LIPA will use the results to create for LDH a map of independent pharmacies in the state that are offering Pfizer COVID vaccine to children ages 5-11.

Keep in mind that the PREP Act authorizes qualified pharmacists and pharmacy technicians to both order and administer vaccines to children **ages 3 and above** and this takes precedence over any more restrictive requirements in Louisiana law and/or

regulations relative to age ranges for pediatric vaccines ordered and administered by pharmacists.

Here are links to [slides from October 21st presentation](#) by Dr. Frank Welch who is with OPH as well as a [Health Alert Network Memo](#) and [Pfizer Vaccine Comparison Chart](#).

If you plan to request pediatric vaccine and have it available on “Day 1” please place your order in LINKS **now** and order both your first and second doses.

If you have questions about COVID vaccines for children—or any aspect of COVID vaccines for that matter—please do not hesitate to contact us. We are happy to help and find you the answer if we do not know it!

Just One Week Remaining to Get Your “Single Sheet” DEA 222 Order Forms

Effective next Saturday, October 30th, the DEA’s single sheet DEA 222 order form becomes mandatory and **triplicate DEA order forms will no longer be accepted or available**. This is the form that allows you to order and transfer Schedule I and Schedule II controlled substances. If you need to place an order for single sheet DEA 222 order forms, you can submit a request on the DEA website [here](#). (You will need to enter your DEA Number to begin the ordering process). If you have unused triplicate DEA order forms, you can send them to DEA Registration Section, 8701 Morrisette Drive, Springfield, Va. 22152

Medicare and Louisiana Medicaid Annual Enrollment Now Underway

With annual open enrollment underway, remember that as a benefit of LIPA membership, **your pharmacy has free access to Amplicare's Medicare plan selection tool, which can be a very useful tool in helping to mitigate DIR fee exposure and a “win-win” for both the patient and the pharmacy!** We encourage you to check out the [webpage with links](#) to Amplicare’s Medicare Plan selection training and tools and make the maximum use of it.

While Medicare and Louisiana Medicare enrollees can change health plans at any time during the year “for cause”, annual open enrollment is the time when they can change to a different health plan just because they want to.” Your Medicare and Medicaid patients may ask you for your input or have questions. Our federal partner NCPA has produced three resources that we highly recommend to you and your staff who may get questions from Medicare beneficiaries during open enrollment which begins today (October 15th) and continues through December 7th:

Here are some additional tools, courtesy of our federal partner NCPA:

[Medicare Part D 2022 Pharmacist Quick Reference Guide](#)

This two-pager is intended for use by pharmacy only and not for distribution to patients. It includes “fast facts” on deductibles, out-of-pocket maximums and 2022 LIS co-pay amounts.

[Medicare Part D 2022 Fact Sheet](#)

Some of our takeaways from this Fact Sheet:

- Of the top ten Medicare Part D Plans for 2022, just two (Silver Script Choice and Elixir Rx Plus which is a plan of Rite Aid’s PBM Envision) include independents on their Preferred Cost Sharing Network
- Beneficiaries who purchase drugs with retail price averaging \$370/month will not enter the “Donut Hole” phase.

The average Part D monthly premium is increasing by just under 5% (4.9%)

[Template for Bag Stuffer](#)

This bag stuffer is 1/3 of a letter-size sheet of paper and includes important precaution that some Medicare drug plans that advertise no or low co-pays may require you to go to only certain pharmacies. You could modify the message if you are offering appointments to answer questions or help with plan comparison.

Medicare Cost of Dispensing Survey Response Deadline is Fast Approaching (November 17th)

The deadline for pharmacies to submit their responses to the Louisiana Medicaid Cost of Dispensing Survey was extended by LDH to Wednesday, **November 17th**. Please make sure that you devote sufficient time to survey completion to capture all of your costs of dispensing. In January 2020, a national survey showed that the actual cost of dispensing Medicaid prescriptions in Louisiana considerably exceeded the current dispensing fee.

If you have questions or need technical assistance with completion of this important survey, contact the Myers & Stauffer Cost of Dispensing Help Desk:

Email: disp_survey@mslc.com

Call: 800-374-6858

Many of you have expressed concerns to us that the ingredient cost component of Medicaid reimbursement for prescription drugs needs to be revisited. The reality is that you are seeing inadequate reimbursements for both brand and generic drugs with NADAC pricing. **Please continue to provide LIPA with detailed information on the drugs in which NADAC is below your drug ingredient cost for your pharmacy (drug name, strength, dose form, current NADAC, date of service, ingredient cost from the invoice or a copy of the invoice).** This information will be presented to LDH staff and leadership to demonstrate the urgent need to address the unreasonable NADAC reimbursement on certain drugs in Louisiana.

Myers & Stauffer also conducts NADAC surveys and maintains the pricing schedule for CMS. This price has formed the ingredient cost component for a large number of states including Louisiana Medicaid. Particularly for Brand drugs it is necessary to file appeals for adjustment. You can file a price complaint using the fillable pdf at [Medicaid NADAC price appeal](#) Notice that you will need to send a purchase record or invoice. We need to see the action Myers & Stauffer takes. While Louisiana Medicaid has made completion of the cost of dispensing survey mandatory, the monthly national NADAC survey conducted on behalf of CMS is voluntary and unfortunately, the reference price is based on a small survey that does appear to accurately reflect the actual experience of Louisiana pharmacies.

Nursing Homes with a Significant Number of Residents and/or Staff Yet to Be Vaccinated

With the approval of Moderna boosters, we expect that our independent pharmacies with commitments to provide onsite vaccines in LTC facilities will be very busy the next couple of weeks. Keep in mind that in certain cases, if you are providing onsite vaccines in Assisted Living facilities (not skilled nursing homes) or group homes, in many cases you will also be able to bill for the “in home” additional fee which is \$32.60. Remember to check with the facility to see if they also have residents or employees who still need their initial dose of COVID vaccine. We are

EPAP Claims Deadline

Sunday, October 24th is the deadline to get your EPAP Claims submitted if you filled patients. A major change in EPAP for Hurricane Ida was the requirement that patients call and register for the EPAP Program. Uninsured patients who successfully enrolled are given four “numbers” to provide to their pharmacy for claim purposes.

Member ID (12 digits)

Group # (Example EPAP1LOCATIONB)

BIN # (Example 003858)

PCN# (Example A4)

LIPA Communications

Although LIPA sends this newsletter to over 500 recipients each week, it may not be going to every member of your team who could benefit from the information. We encourage you to contact the LIPA office to have their e-mail address added to the mail list. Send us an email with the address you would like added communications@lipa.org

LIPA continues to add pharmacy team members to the *GroupMe* chat group that we have been using to rapidly respond to COVID-related vaccine (and other) questions and get real time feedback from you: our “boots on the ground.” To be added to the chat group (the *GroupMe* application can be downloaded from the App Store on your smart phone) call Danielle Hodge at 225-308-2030 or email her at hodge@lipa.org with your name, pharmacy name, and cellphone number.

Complaints to LDI Regarding PBM Audits and Other Unfair or Deceptive Practices

LIPA is concerned about PBM audit practices related to prescriptions filled under Department of Insurance and Board of Pharmacy emergency rules and guidance in the wake of Hurricane Ida. We know many chain pharmacies were closed after Ida and did not reopen for several days. Without an ability to contact a chain to transfer prescriptions, process claims, or verify insurance coverage, many independent pharmacies relied on LDI and BOP guidance, dispensing emergency prescriptions based on the label alone. The possibility that PBMs will retroactively deny coverage, require a full co-pay from patients, or allege prescriptions were refilled by mail order may create issues for your pharmacies down the road.

Considering those emergency situations and other MAC Appeals that were denied prior to the unanimous decision in [Rutledge v. PCMA](#), LIPA strongly encourages member pharmacies and all independent pharmacies in Louisiana to file complaints with the Department of Insurance and the Board of Pharmacy if they suspect unfair or deceptive practices by PBMs.

LIPA is working to further streamline the process, but for now, complaints against PBMs may be filed with LDI here: [LDI Online Complaint Filing](#). LDI cannot know the extent of the issue without complaints being formally filed by your pharmacy or patients. The actual number of formal complaints filed (when compared to verbal complaints brought to our attention) is historically low and is frequently used by PBMs to make the case that there is not a problem. Please let us know if we can assist your filing in any way.

Dates to know

Today-December 7th, Medicare and Louisiana Medicaid Open Enrollment

November 13, LPA 2021 Virtual Convention

November 17, Medicaid Cost of Dispensing Survey Due

November 20, LIPA hosted ULM/LSU Tiger Stadium (Baton Rouge, LA)