

Pharmacy Interoperability and Emerging Therapeutics Task Force 2023 Meeting #9

Shelly Spiro, Co-Chair

Hans Buitendijk, Co-Chair

August 30, 2023



Call to Order/Roll Call

Mike Berry, Designated Federal Officer, ONC

Pharmacy Interoperability and Emerging Therapeutics Task Force 2023 Roster

Name	Organization	Name	Organization
Hans Buitendijk* (Co-Chair)	Oracle Health	Shelly Spiro (Co-Chair)	Pharmacy HIT Collaborative
Pooja Babbrah	Point-of-Care Partners	Deven McGraw*	Invitae Corporation
Chris Blackley	Prescryptive	Ketan Mehta	Micro Merchant Systems
Shila Blend*	North Dakota Health Information Network	Justin Neal	Noble Health Services Dell Medical School,
David Butler	Curatro, LLC	Eliel Oliveira*	University of Texas at Austin
Steven Eichner*	Texas Department of State Health Services	Naresh Sundar Rajan*	CyncHealth
Rajesh Godavarthi*	MCG Health, part of the Hearst Health network	Scott Robertson	Bear Health Tech Consulting
Adi V. Gundlapalli**	Centers for Disease Control and Prevention	Alexis Snyder*	Individual
Jim Jirjis*	HCA Healthcare	Fillipe Southerland*	Yardi Systems, Inc.
Summerpal Kahlon	Rocket Health Care	Christian Tadrus	Community Pharmacy Owner
Steven Lane*	Health Gorilla	Sheryl Turney*	Elevance Health
Meg Marshall**	Department of Veterans Health Affairs	Afton Wagner	Walgreens
Anna McCollister*	Individual		



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10:30 AM	Call to Order/Roll Call
	Mike Berry, Designated Federal Officer, ONC
10:35 AM	Opening Remarks
	Mike Berry, Designated Federal Officer, ONC
	Tricia Lee Rolle, Staff Lead, ONC
10:40 AM	Recommendation Drafting Example Discussion
	Hans Buitendijk, Co-Chair
10:55 AM	Task 3 Introduction: Identify standards needs to support prescribing and management of emerging therapies including, but not limited to specialty medications, digital therapeutics, and gene therapies
	Shelly Spiro, Co-Chair
11:00 AM	Presentation
	 Pooja Babbrah (TF Member), Practice Lead, Pharmacy and PBM Services, Point-of-Care Partners
	 Justin Neal (TF Member), Vice President of Patient Support and Data Contract Services Noble Health Services
11:10 AM	Task 3 Discussion
	Shelly Spiro, Co-Chair
	Hans Buitendijk, Co-Chair
11:50 AM	Public Comment

Mike Berry, Designated Federal Officer, ONC



11:55 AM

Task Force Work Planning

Shelly Spiro, Co-Chair

Hans Buitendijk, Co-Chair

Opening Remarks

Mike Berry, Designated Federal Officer, ONC

Tricia Lee Rolle, Staff Lead, ONC

Pharmacy Interoperability and Emerging Therapeutics Task Force 2023 Charge

Overarching charge: Identify recommendations to support interoperability between pharmacy constituents, and the exchange of information necessary for medication management, patient safety and consumer engagement.

Recommendations Due: November 9, 2023

Specific charge:

- 1. Public Health, Emergency Use Authorizations, and Prescribing Authorities
- Identify opportunities and recommendations to improve interoperability between pharmacy constituents
 (prescribers, pharmacists, pharmacy benefit managers, dispensers, payers, intermediaries, PDMPs, public health
 agencies, HIEs, third party service providers, consumers, etc.) for pharmacy-based clinical services and care
 coordination.
- 3. Identify standards needs to support prescribing and management of emerging therapies including, but not limited to specialty medications, digital therapeutics, and gene therapies.
- 4. Identify policy and technology needs and considerations for direct-to-consumer medication services.

Emerging Therapeutics

TASK 3: August 30- September 27

- 3. Identify standards needs to support prescribing and management of emerging therapies including, but not limited to specialty medications, digital therapeutics, and gene therapies.
 - a. What standards gaps exist for the prescribing and management of:
 - i. specialty medications
 - ii. digital therapeutics
 - iii. gene therapies

Recommendation Drafting Example Discussion

Hans Buitendijk, Co-Chair

Task 3 Introduction: Identify standards needs to support prescribing and management of emerging therapies including, but not limited to specialty medications, digital therapeutics, and gene therapies

Shelly Spiro, Co-Chair

Presentation

Pooja Babbrah (TF Member), Practice Lead, Pharmacy and PBM Services, Point-of-Care Partners

Justin Neal (TF Member), Vice President of Patient Support and Data Contract Services Noble Health Services



How are Specialty Medications Defined?

Criteria	CMS	Pharmacy	Life Sciences	Payers/ PBMs	Health Systems/ Providers
Cost	•			•	•
Complexity of Medication (Delivery, Handling, Administration, Side Effects, etc)		•		•	•
Payer Policies/Plan Sponsor Preferences		•		•	•
Complex Patient Management (eg, patient education, patient management prior to or following administration, care coordination)		•			
FDA Restrictions (eg, REMS)			•		•
Supply Restrictions		•	•		

High Variability in Ownership of Specialty Medication Coverage

Factors that may influence whether a medication or product is covered under pharmacy vs. medical benefit:



Location

- Facilities, ambulatory practices and thirdparty ancillary centers predominantly contract with payers, not PBMs
- Use of X12 standards and practice management, revenue cycle management vendors that rely on X12



Product Form/ Administration Method

ePA ePA

Coverage Complexity

- Cost, disease state and availability of drug alternatives/administration complexity
- Payers will more tightly control utilization management
- Biosimilars, new product introductions or off-label use

pharmacy benefit

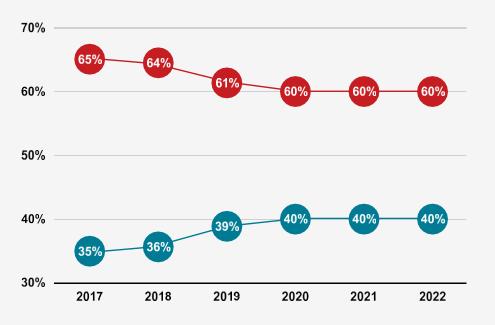
Pill based medications often remain on

- Infusions, injections and products that require skilled administration and additional service billing rely on a facility or provider office, so often remain on medical benefit
- Compounded products can be found on both
- Self-administered medications that can be dispensed at a retail pharmacy or shipped to patient directly are more likely to be covered on pharmacy benefit
- Coverage of non-durable medical equipment and durable medical equipment (DME) that supports a medication may vary by line of business for a payer

The lack of industry standard definition makes the ability to crosswalk patient by patient between medical and pharmacy benefit even more critical.

Specialty Prescription Volume by Coverage 2019

Specialty Pharmacy Coverage Spend Medical vs. Pharmacy Expected Future Trend 2017-2022



Specialty pharmacy coverage under medical benefit could go higher then 40% depending on trajectory of new oncology and digital therapeutics. Also, as information technology infrastructure improves for supporting medical benefit, likely to be less pressure to move to pharmacy benefit because of lack of technology.

Medical Benefit Pharmacy Benefit Volume Trend Assumptions and Input • IQVIA Specialty volume and cost analysis

· CMS Part D and Part B prescription data

· Estimated volume projections using dollars, cost

PSG Drug Trend report

per claim and volume

Specialty Prescription Volume by

Sources:

PSG Drug Trend Report (CY2018, CY2019, CY2020) and POCP Analysis of expected future trends

POCP Analysis of IQVIA Medicine Use and Spending in the U.S. report, CMS Medicare Part B and Medicare Part D Spending Dashboard and Data, PSG Drug Trend Report, Conversations with IQVIA and CMS

Point-of-Care Partners | Proprietary and Confidential

Existing Standards Focused on Medications Covered Under Pharmacy Benefit

		Standards <i>F</i>	Available	
		Pharmacy Benefit		
Content & Function	Formulary & Benefit	Real Time Benefit NCPI	ePA OP	Test Claim Yes
Content & Funding		Surescripts or P2P 270/1	Yes	Yes
Validate Coverage		Yes	res	Specific
Patient Specific Coverage		Yes		
Shows Coverage at Product/ Services	Yes	Yes		
Identifies Criteria at Product/ Services		Vec		Partial
Providers Alternatives, Site of Care Restrictions, Pricing	Yes	Yes	Yes	
Enables Capture of Patient Clinical Data			Yes	Yes
Supports PA Submission				165
Support PA Status				





Patient Scenario

- 37-year-old female patient with rheumatoid arthritis (RA)
- After being off all medications due to pregnancy and relatively stable over last few years, patient is experiencing recurring flare ups – altering ability to live life with young children
- Unresponsive to OTC and generic NSAID options
- RA medication options split across patient's medical and pharmacy benefit plans
- Patient makes an appointment for medication review

Sample RA Medication Options

NSAIDS Corticosteroids Humira Methotrexate Hydroxychloroquine Remicade
Rituximab
Cimzia
Enbrel
Simponi
T-cell Costimulatory
Blocking Agents
B-cell Depleting Agents





Covered under pharmacy benefit

Covered under medical benefit

Provider and Patient Journey: Prescribing a Specialty Medication: Current State

Covered under pharmacy benefit

Covered under medical benefit

Visit

Diagnosis

Administer/Dispense

Patient Outcome

Follow-up

Pre-Encounter



- Patient provides insurance information to practice
- □ Practice runs medical eligibility (270/271)
- ☐ Practice runs pharmacy eligibility (270/271)
- Practice pulls formulary and benefit information from Intermediary
- Practice pulls medication history from Intermediary

Humira Cimzia Enbrel Remicade

Prescribing Decision



- Prescriber diagnoses patient, makes decision to prescribe
- Provider can see Humira is covered under pharmacy benefit with PA and step therapy
- Provider knows that he had similar patient who had great success with Remicade but does not see it as a covered option for this patient
- Without medical benefit coverage, provider either prescribes Humira, knowing it will be covered or Remicade and sends to specialty pharmacy to "see what happens" leaving the research of coverage to the patient or specialty pharmacy

Benefit Investigation



- ☐ Specialty pharmacy or Hub begins manual benefit investigation process
- □ Payer may require step therapy
- Practice or specialty pharmacy begins prior authorization process
- Medication
 dispensed to patient
 once approved by the
 payer

Patient Arrival at Emergency Dept



- □ Patient continues to experience symptoms
- □ Patient ends up in emergency room due to severe pain
- □ ER doctor prescribes something for the pain and recommends patient followup with specialist

Follow-up Visit



- Patient makes followup appointment after ER visit
- Provider determines additional treatment options

Note: A hub is a service that allows a manufacturer to have a singular point of contact with patients who utilize their therapies. Services range from benefits investigation, prior auth processing, drug delivery, financial and co-pay assistance, patient education, compliance with REMS, data reporting, and prescription triaging.

Provider and Patient Journey: Prescribing a Specialty Medication: Future State

Covered under pharmacy benefit

Covered under medical benefit

Visit

Diagnosis

Administer/Dispense

Patient Outcome

Patient Arrival at

Follow-up

Pre-Encounter



- Patient provides insurance information to practice
- ☐ Practice runs medical eligibility (270/271)
- □ Practice runs pharmacy eligibility (270/271)
- Practice pulls formulary and benefit information from Intermediary
- Practice pulls medication history from Intermediary

Humira

Cimzia Enbrel Remicade

Prescribing Decision



- Prescriber Diagnoses Patient, makes decision to prescribe
- Provider can see Humira is covered under pharmacy benefit with PA and step therapy.
- ☐ Provider knows that he had similar patient who had great success with Remicade.
- Provider can see Remicade is covered under medical benefit
- Provider can see coverage restrictions for Remicade
- ☐ Provider prescribesRemicade

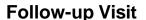
Benefit Investigation



- Practice or Specialty Pharmacy completes prior authorization
- ☐ Medication dispensed to patient



- Patient continues to experience symptoms
- Patient ends up in Emergency room due to severe pain
- □ ER doctor prescribes something for the pain and recommends patient follow-up with specialist





- Patient makes follow-up appointment
- ☐ Patient no-longer experiencing pain

Value for provider, payer and patient:

Provider can direct patient to best alternative at the lowest cost to the patient.

Provider and patient have visibility to all specialty medications covered under pharmacy OR medical benefit within workflow, potentially avoiding high-cost ER and/or hospital visits

Provider and Patient Courney: Prescribing a Specialty Medication: Workflow and Standards

Visit

Diagnosis

Administer/Dispense

Patient Outcome

Follow-up

Pre-Encounter



Prescribing Decision



Benefit Investigation



Patient Arrival at Emergency Dept



Follow-up Visit



- Patient or provider system provides patient insurance
- 2. Provider checks for active coverage across pharmacy and medical benefit
- 1. Provider evaluates patient, makes diagnosis and review medication options
- 2. Patient and provider review patient options
- 1. Provider or specialty pharmacy administers and/or dispenses medication
- 2. Provider or specialty pharmacy submits claim to payer
- Patient presents to a new provider, new location
- 2. Benefit check repeat from step 1
- 1. Patient returns for follow up with PCP or specialist
- 2. If medication under medical, may not appear on medication list

- Eligibility
- Formulary & Benefit
- Medication History

- X12N
- NCPDP
- HL7 FHIR IGs

- Formulary & Benefit
- Real-Time Prescription Benefit Check (RTBC)
- Coverage Requirements Details
- Price Cost Transparency

- Medical Eligibility & Benefits Coverage Requirements Details
- Documentation Templates & Requirements
- Price Cost Transparency
- Prior Authorization Support
- Prior Authorization Submission/Status

- Medical Eligibility & Benefits
- Coverage Requirements Details
- Documentation Templates & Requirements
- Electronic Prior Authorization
- Prior Authorization Support
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- Medication History
- Medical Eligibility & Benefits
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Specialty Pharmacy Workflow and Interoperability Needs

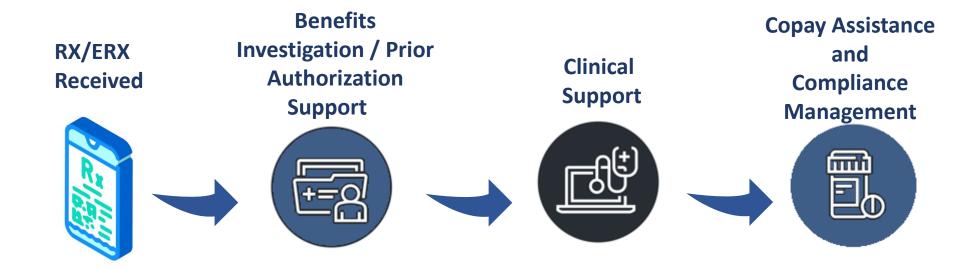
HITAC TF Presentation: 8/30/2023



Overview of Specialty Pharmacy Workflow



<u>Noble Health Services</u>: Mid-range specialty pharmacy, 2 pharmacies licensed and serving patients in all 50 states. Carries 3 specialty pharmacy accreditations (URAC, ACHC, NABP.) Considered an independent specialty pharmacy as opposed to a "vertically integrated" specialty pharmacy owned by a large PBM.





Role of Specialty Pharmacy

The role of specialty pharmacy is to sit in the middle of various health care and logistics stakeholders to eliminate points of friction, in a system designed around barriers. Due to these being high-cost medications, PBMs and insurance providers build restrictions to limit utilization of those therapies. Simultaneously they set high bars for pharmacies dispensing these medications to maintain and maximize the outcome for patients on those therapies.





Technology barriers & Interoperability Opportunities





Clinical/Pharmaceutical Care

- Proper dosing evaluation (demographic info)
- Appropriate dx for therapy
- Complete Medication list
- PA Support



Payor Barriers

- Payor Network Reporting Requirements for access
 - ICD-10 for use of medication
 - Utilization Management
 - Compliance Reporting
 - Reasons for discontinuation
 - Turn-around time



Accreditation Barriers

- Payor Barrier of entry & best practices
- Full list of diagnoses and medication list
- Complete DUR
- Outcome tracking (Cure rate, QOL, etc.)
- Turn-around time reporting
 - Prior authorization & chart access



Manufacturer Barriers

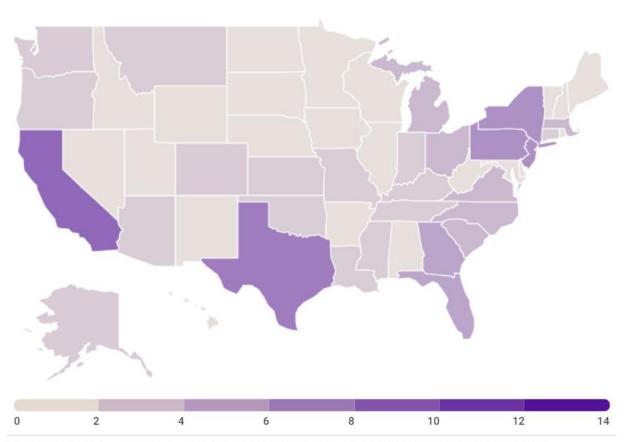
- LDD Access and Reporting
- REMS Reporting (ie Pregnancy test)
- Prior Authorization and Turn-around time



National Footprint, National Needs



Total number of active HIEs in each U.S. state



Local prescribing and fulfilment have local integration solutions (HIEs, Health system cooperation.)

As patient footprint in a non-integrated PBM/Health System expands, standardization via tech vendors (Pharmacy Management Systems, Clinical Management Systems, etc.) matter greater to provide the necessary info into the pharmacy workflow.





Case Sample:

Hep-C & Crohn's Patient



Patients prescribed a medication via a commercial insured program with a restricted payor network.

Hep-C Patient



Accreditation & Payor Data Requirements

- Full list of diagnoses and medication list
- Complete DUR
- Lab values relevant to care:
 - Genotype
 - Viral Load
 - Cirrhosis Status
 - Prior treatment status
 - SVR-12 after treatment to confirm cure
 - \$1K invoice

Crohn's Patient



Accreditation & Payor Data Requirements

- Full list of diagnoses and medication list
- o Complete DUR
- Lab values relevant to care:
 - Negative TB test before start and annually
- # of flare-ups
- Steroid use





Feedback from Specialty Pharmacies



Information Specialty Pharmacies should be providing back:

- Capturing QOL information about care effectiveness
- Providing fill history/Compliance and discontinuation information
- Identified DRPs





Thank you!



Justin Neal, PharmD, MBA, CSP

Vice President of Patient Support and Data Contract Services

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Task 3 Discussion

Shelly Spiro, Co-Chair

Hans Buitendijk, Co-Chair

Emerging Therapeutics

TASK 3: August 30- September 27

- 3. Identify standards needs to support prescribing and management of emerging therapies including, but not limited to specialty medications, digital therapeutics, and gene therapies.
 - a. What standards gaps exist for the prescribing and management of:
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Public Comment



To make a comment please Use the Hand Raise Function

If you are on the phone only, press "*9" to raise your hand

(Once called upon, press "*6" to mute/unmute your line)

All public comments will be limited to three minutes

You may also email your public comment to onc-hitac@accelsolutionsllc.com

Written comments will not be read at this time, but they will be delivered to members of the task force and made part of the public record

Task Force Work Planning

Shelly Spiro, Co-Chair

Hans Buitendijk, Co-Chair

Upcoming Meetings

Month	Task Force Meeting Dates	HITAC Meeting Date
September	13, 20, 27	September 14 (TF Update)
October	4, 11, 18, 25	October 19 (TF Update)
November	1	November 9 (Final Recommendation and Vote)

Adjourn