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Next Review:	Insert
Owner:	Ambulatory Pharmacy Steering Committee
Policy Area:	Pharmacy Services
Applicability:	

CHNw Specialty Pharmacy Charity Care Program

PURPOSE: To ensure that a systematic process exists for the provision of pharmacy services at a reduced rate to those patients who have documented limited resources to pay for their prescription drugs, co-payments, and pharmacy related deductibles as approved by Community Health Network (CHNw) by the CHNw Specialty Pharmacy. The program is available to patients that have inadequate prescription drug coverage, gaps in their insurance coverage, no prescription drug coverage, for patients with a household income at or below the Federal Poverty guidelines or need financial assistance to obtain their prescription drugs (i.e., high co-pays), as defined and approved by CHNw for their family size, defined below. CHNw offers a multiple tiered discount program that may help patients receive their medications at a lower cost.

POLICY: In recognizing the medical needs of the indigent, CHNw provides necessary quality medical care regardless of race, creed, color, sex, national origin, sexual orientation, physical abilities, age or ability to pay. CHNw offers many direct programs and collaboration with Jane Pauley Community Health Centers. CHNw recognizes its responsibility to the community by ensuring that patients requiring necessary medical care and prescription drugs are not denied services based solely on lack of financial means. The necessity for medical treatment of any patient will be based upon clinical judgment and could exclude all elective services without regard to the financial status of the patient. Although reimbursement for services rendered is critical to the operation and stability of CHNw, it is recognized that not all individuals possess the financial ability to purchase essential prescription drugs. Therefore, in keeping with CHNw's commitment to serve all members of its community, CHNw has provided a multiple tiered charity program that will fit the needs of all situations where need and inability to pay co-exist. The pharmacy services provided will be reimbursed at a reduced level based on established income criteria as defined in this policy.

CHNw SPECIALTY PHARMACY POLICY AND PROCEDURE: PHARMACY DEPARTMENT

SUBJECT: CHNw Pharmacy Charity Care

DEFINITIONS:

- Cash Pay Program: CHNw patients are offered discounts on hundreds of generic and brand name medications that are competitive with market retail prescription pharmacies. Pricing is based on whether drug is a 30 or 90-day supply. These programs are available for direct pick-up or mail order with a prescription for a CHN provider.
- CHNw Charity Care Prescription Benefits Program: All active CHNw Charity Care members who are seen by providers in CHNw approved locations are eligible to participate in the CHNw Charity Care Prescription Benefit Program. Co-pays of prescriptions are dependent upon charity care members' income levels and are determined at the time of enrollment.
 - CHNw Charity Care Prescription Benefits is available for CHNw patients that have been approved for charity care benefits, discounts, or financial assistance.
 - CHNw Charity Care Prescription Benefits offers a monthly affordable co-pay for prescription drugs based on family size and income level; gap assistance, cash-based programs, and financial assistance for high co-pay programs.
 - A approved CHNw Pharmacy Financial counselor or Medication Assistance Coordinator (MAC) offers free appointments, counseling, and consultation to assist patients with their application to the CHNw Charity Care Prescription Benefit program.
- CHNw Charity Care Mail Order Services: All CHNw Charity Care Prescription Benefits Program(s) and Charity Care Medication Adherence Programs are fulfilled through direct fill prescriptions and refills that are completed through mail order directly to the patients' home or care site. CHNw requires that all controlled substances are picked up directly from the CHNw Specialty Pharmacy.
- CHNw Subsidized Discount Drugs. Subsidized Drug Program: A pre-approved list of drugs that are discounted (provided at cost or subsidized) for CHNw patients that qualify for the CHNw Charity Care program or require assistance with a high cost or specialty medication. A Subsidized Drug Formulary is available to physicians and patients. The drug subsidy discount program is provided at direct acquisition cost or discount, plus a minor dispense fee.
- CHNw Foundation (also referred to as the MAC Fund): This is an internal CHNw Foundation Fund that is used on a short-term basis to subsidize patients' prescription drug coverage. Patients needing assistance with medication costs must complete the necessary application and be listed as a certified indigent patient, have a gap in drug coverage, be within the Medicare donut hole, or be challenged with high-cost co-pays in order to be eligible for this fund.

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- CHNw Charity Care Medication Adherence Program: CHNw is dedicated to making sure patients stay on the necessary medications and recommended medication adherence programs. Our pharmacy services support a wide variety of custom-designed medication programs that help patients remain adherent to their drug regimens, get their refills on time, and monitor their clinical outcomes.
- Federal Poverty Level (FPL) Guidelines: Poverty income levels determined by the Federal Government.
- Certified Indigent and Indigent is term used to refer to a person who lacks food, clothing, and other necessities of life because of poverty or lack of resources. Indigent also means a person who has insufficient property to maintain himself/herself and to others who depend upon him/her for a basic standard of living. The term “indigent” is not expressly defined in statute but is ordinarily understood to mean being poor usually without being destitute; it also understood as being impoverished or needed for necessary support.
- Medication Assistance Coordinator (MAC): A highly trained pharmacy financial counseling professional that works directly with patients, coordinating with their physicians, nursing staff, social workers, insurance companies and pharmacy to identify the assistance program that best fits the patients’ unique needs. MAC coordinators work with patients throughout the entire process, providing follow-up with patients to ensure they have access to the necessary drug programs.
- Manufacturer-Based Programs: CHNw Medication Assistance Coordinators (MACs) will work with patients to find all available industry financial assistance programs (also referred to as FAP) which may also be referred to as:
 - **Prescription Assistance Programs (PAP)**: A prescription assistance program is offered by drug manufacturers for self-pay patients that have no insurance for certain drug categories. All self-pay patients that qualify under the PAP program will receive free medications for all prescriptions dispensed. Most PAP programs have a simple auto enrollment process with registration data with prescriptions dispensed in an excel format. The lifecycle for PAP program is typically 45-60 days. Patients may qualify for PAP if they:
 - Do not have insurance
 - Are a resident of Indiana
 - Are being treated by a CHNw doctor or clinic

Have low income (typically less than 200% of the Federal Poverty Level) or Medicaid Pending Status: If a patient has already applied for Medicaid and has a pending status, limited charity care coverage and Cash Programs are eligible for those patients in order to ensure there are no duplicate discounts. All Pending Medicaid patients’ purchases will be made on WAC and not 340b.

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- **Manufacturer Assistance Programs (MAP):** The MAP is available to assist members in obtaining medications through pharmaceutical manufacturer programs. Most pharmaceutical manufacturers provide medications to individuals with little or no prescription drug coverage at no charge. Each pharmaceutical manufacturer has different criteria for eligibility, but many CHNw patients and Charity Care members will qualify. Although some medications are not covered by CHNw Charity program, many are made available through the MAP. The MACs will prepare all applications and send to CHNw providers for signatures. The CHNw Pharmacy can help members determine if drugs are covered or are available through a MAP. Some medications may take up to four to six weeks from the time the MACs order the drugs until the day they are received from the pharmaceutical manufacturers. A MAP is more application intensive and requires the same information as a typical Medicaid eligibility (i.e., work history, bank statements, etc.). MAPs are from medicine companies who may be able to help patients pay for their medications if they:

- Do not have insurance
- Do not have enough insurance for high cost specialty medications
- Have a low income

You may be asked to document your income, Examples of paperwork that may be requested are:

- Three recent paycheck stubs
- A copy of all insurance(s) card(s), medical and prescription
- W-2 forms
- Your most recent State and/or Federal tax return(s) 1040 form
- Social Security benefit letter or 1099 form

EQUIPMENT: All Cash Discount Programs and Charity Prescription Drug Programs are adjudicated through ScriptPro Pharmacy Management System (PMS) and Veridikal ReAssureRx PBA Services. All Applications for Charity and Supporting Documentation will be stored in Epic and Drug Assistant.

**CHNw SPECIALTY PHARMACY POLICY AND PROCEDURE:
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ELIGIBILITY, PROCEDURES & GUIDELINES

Who is eligible for CHNw Charity Care? If a patient needs information regarding the CHN Charity Care program or needs to apply for CHN Charity Care Pharmacy Benefits, they may contact Admissions, Business Office, or the Pharmacy toll-free at 833-636-6392 to be routed to the appropriate MAC. Eligibility is based on a 12-month period with periodic financial verification processes. Our pharmacy and MAC professionals follow our patients through the entire care process.

1. Is the patient a resident of Indiana?
2. Does the family size and household income fall at or below the amount listed below?

Family Size	Household Income Limit
1	\$30,150
2	\$40,600
3	\$51,050
4	\$61,500
5	\$71,950
6	\$82,400
7	\$92,850
8	\$103,300

The total family income is compared to current federal poverty level guidelines (See Federal Poverty Level Guidelines above). If the patient's income falls below 300% of the guidelines, the patient is eligible for some level of financial assistance. The most current FPL guidelines will be used, as published each February in the Federal Register by the Department of Health and Human Services.

Persons eligible for assistance will be responsible for a portion of billed charges in accordance with the FPL Guidelines. All charges within ScriptPro PMS system are applicable under this policy. For Any direct Medical Discounts, see also CHN Charity Care Policy # [NETFIN003](#).

CHARITY CARE GUIDELINES

CHNw Charity Care is applied after all other insurance and/or other financial benefits have been explored/exhausted, including but not limited to State and Federal assistance programs, FAP and charitable or endowment funding. CHNw Charity Care is available only for pharmacy services that are reasonable and necessary for the diagnosis and treatment of illness or injury.

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CHARITY CARE ENROLLMENT/RENEWALS: Make an appointment with a pharmacy counselor or MAC. If you have submitted and been denied for an existing MAP/PAP program, your application and all supporting documentation may be used for CHNw Charity Care enrollment. New enrollees must bring these three required documents:

- **Identification** – Enrollees are required to provide one form of identification for each household member applying for CHNw Charity Care in the form of:

- Driver's license
- State identification card
- Resident alien card
- Birth certificate (for children only)
- U.S. immigration card
- U.S. Naturalization, Citizenship or other federal documents
- Passport

- **Residency** – Enrollees are required to provide proof of residency of the state of Indiana. Here are some examples:

- Household bill (electric or water)
- Lease agreement
- Medicaid/Medicare/CHIP letter
- Attorney general letter
- Food stamp letter

- **Income** - Enrollees will need to provide proof of ALL family income for the past 30 days. Here are some examples:

- Paycheck stubs showing name, date, employer, and gross earnings
- Wage verification form signed by the employer
- Document verifying sponsor, who must offer his/her source of income, and demographics
- Final divorce decree showing amount of child/alimony support
- Proof of retirement income
- Copies of documents or checks from federal/state agencies
- Workforce Commission notice of benefits
- Social Security disability award letter
- Income Tax Return

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CHNw CHARITY CARE LEVEL ASSIGNMENT

After review of the above enrollment or renewal documentation by a MAC or approved CHNw Financial counselor, CHNw will assign a patient to the appropriate Charity Care Level in which the patient and family qualifies. For Example:

CHNw Charity Care Level

Level 1 – Certified Indigent \leq 200% of Federal Poverty Line

Level 2 – 201-250% of Federal Poverty Line

Level 3 – 251-300% of Federal Poverty Line

Level 4 – 300% of Federal Poverty Line or Above

Level 5 – Drug Discount/ Subsidy (Level 1-3)

Level 6 – Drug Discount/ Subsidy (Level 4+)

Once the patients or charity care members are enrolled and approved, the enrollee will be provided the assigned Charity Level 1-5 that they are approved to participate within. CHNw will provide the charity paperwork and benefit summary to each member. The patient/member must provide that paperwork to the CHNw Specialty Pharmacy at the time the prescription is filled in order to receive the appropriate discount. The following data will automatically be associated with the patients' eligibility and enrollment in the CHNw Charity Care Prescription Benefit Program and stored in ScriptPro Pharmacy Management Systems (PMS) and Veridikal ReAssureRx:

- Medical Record Number (MRN)
- Members Information (Name, Date of Birth, and Gender)
- Name of Primary Care Provider (PCP)
- Copayment amounts
- Effective and termination dates
- Telephone number to contact the member

Sample:

BIN	PCN	Group
015888	CHN	CHNCASH
015888	CHN	CHNLVL1
015888	CHN	CHNLVL2
015888	CHN	CHNLVL3
015888	CHN	CHNLVL4
015888	CHN	CHNLVL5
015888	CHN	CHNLVL6

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CHARITY CARE COPAYMENTS:

All patients approved for Charity Care Prescription Benefits Program are asked to pay copayments based on their ability to pay and the CHNw Charity Care Level assigned to them.

CHNw Charity Care Level	30 Day Rx Copayment	90 Day Rx Copayment
CHNCASH	Based on Tier	Based on Tier
Level 1 – Certified Indigent	\$0	\$0
Level 2	\$5	\$10
Level 3	\$10	\$20
Level 4	\$15	\$30
Level 5 – Level 1-3 \$150.00 Drug Discount/ Subsidy	Drug Cost + \$15	Drug Cost + \$20
Level 6 – Level 4 \$250.00 Drug Discount/ Subsidy	Drug Cost + \$15	Drug Cost + \$20

SUBSIDIZED DRUG:

CHNw has an approved list of Subsidized Drugs that are high cost and specialty drugs. Subsidized discounts are based on the patients' Charity Care Level and pre-approved discount. For Level 1-3 Charity Care programs, drug subsidy is available for drugs that exceed \$150.00 and for Level 4 or higher, drug subsidy is available for drugs that exceed \$250.00. For a sample list of Subsidized Drugs, please contact the CHNw Specialty Pharmacy or MAC.

INSURANCE GAP ASSISTANCE & HIGH CO-PAY FINANCIAL ASSISTANCE:

CHN Charity Program, Foundation, and MAC Fund provides for patients that have gaps in their insurance, have applied for coverage such as Medicaid, or for high co-pay programs. CHN provides financial assistance for qualified patients upon approval for GAP assistance.

WHERE PRESCRIPTIONS CAN BE FILLED:

CHNw Charity Care Prescription Benefit Program members seen at approved CHNw locations may fill prescriptions at the CHNw specialty pharmacy only. The prescription must be written by a CHNw prescriber that is on the current NPI list and the drug prescribed must be on the approved CHNw approved formulary or preferred drug list for the CHNw Mail Order Program.

HOW PATIENTS OBTAIN THEIR MEDICATIONS:

CHNw Pharmacy offers multiple delivery options including: Carrier Service, Mail Order, and Pick-up. All refills will be provided via Mail Order and all controlled substances require manual pick-up and signature. Refills can be requested via the CHNw Specialty Pharmacy website or by calling the CHNw Specialty pharmacy directly.

REPORTING:

CHNw Specialty Pharmacy will provide reporting from ScriptPro, Drug Assistant, ReAssureRx, and annual Charity Care Prescription Benefits.

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KEY POINT:

POLICY ARCHIVAL:

APPROVAL(S):