

Requirements for Long Term Care Pharmacy inclusion in a Long Term Care Network

The [Alliance for Long-Term Care Pharmacy at Home](#) convened an expert panel to describe the requirements of a pharmacy providing these services to a patient in their home, based on the CMS requirements outlined in their guidance manual for facility based patients. CMS issued the [Long-Term Care Guidance](#) on March 16, 2005 with the Medicare Drug Benefit implementation. This guidance document laid out 10 specific requirements that plans were obligated to provide for residents of LTC facilities. Long-term care pharmacy at home brings LTC facility-level of pharmacy care to individuals living at home. The Alliance has developed how these 10 requirements apply to long-term care pharmacy at home. It is the hope of the Alliance that these requirements, as outlined, became the standards by which pharmacy services to this patient population are evaluated.

The requirements are presented in two formats, in a paragraph form in which the [CMS Manual language](#) is italicized and the non-italicized items are the Alliance guidelines for pharmacies providing LTC pharmacy at home services. In the table version, the columns are clearly identified.

We hope that along with the criteria the Alliance has outlined for patient eligibility for these services, a comprehensive service for patients with long-term care levels of need can be effectively delivered in the home environment.

Performance and Service Criteria	CMS Manual Language	Guidelines for Pharmacies Providing LTCP at Home Services
Comprehensive Inventory and Inventory Capacity	NLTCPs must provide a comprehensive inventory of Plan formulary drugs commonly used in the long-term care setting. In addition, NLTCPs must provide a secured area for physical storage of drugs, with necessary added security as required by federal and state law for controlled substances. This is not to be interpreted that the pharmacy will have inventory or security measures outside of the normal business setting.	<ol style="list-style-type: none">1. Medications not normally stocked in a retail pharmacy to meet individual patient needs such as liquid formulations of drugs usually dispensed as tablets or capsules.2. Pharmacy must have adequate stock to fulfill orders and prescriptions daily – urgent orders in a timely manner.3. OTC medications should be available as well and recorded in the patient's medical record.4. Pharmacy will confirm delivery of all new prescription orders to determine urgency, and any existing supply patient has on hand, coordinate any fills with a local or back up pharmacy if needed to ensure the patient receives the medication in a timely manner.
Pharmacy Operations and Prescription Orders	NLTCPs must provide services of a dispensing pharmacist to meet the requirements of pharmacy practice for dispensing prescription drugs to LTC residents, including but not limited to the performance of drug utilization review (DUR). In addition, the NLTCP pharmacist must conduct DUR to routinely screen for allergies and drug	<ol style="list-style-type: none">1. Must meet the requirements of pharmacy practice for dispensing prescription drugs to LTC residents, including but not limited to the performance of drug utilization review (DUR).2. Must have pharmacy software to accept and process both electronic and written prescriptions.3. Must have policy and procedures for both the pharmacy and each patient's home

	interactions, to identify potential adverse drug reactions, to identify inappropriate drug usage in the LTC population, and to promote cost effective therapy in the LTC setting. The NLTCP must also be equipped with pharmacy software and systems sufficient to meet the needs of prescription drug ordering	<p>(patient's home can be an information sheet with how to contact pharmacy, when and who to call for emergencies, when to expect deliveries, community resources, safe medication disposal, medication refrigeration, how to solve problems with medications, delivery, etc) available for review with PBMs.</p> <ol style="list-style-type: none"> 4. Policy and Procedures must include workflow and procedures in the pharmacy to receive prescriptions, process prescriptions, delivery of prescriptions, how controlled medications are ordered and delivered, etc. Sample policy and procedure manuals are available through associations and other companies. Policies and procedures should be specific to the individual pharmacy.
Special Packaging	<p>NLTCPs must have the capacity to provide specific drugs in Unit of Use Packaging, Bingo Cards, Cassettes, Unit Dose or other special packaging commonly required by LTC facilities. NLTCPs must have access to, or arrangements with, a vendor to furnish supplies and equipment including but not limited to labels, auxiliary labels, and packing machines for furnishing drugs in such special packaging required by the LTC setting.</p>	<ol style="list-style-type: none"> 1. Compliance packaging for all medications, including maintenance medications, must be provided in 30 days or less. 2. Oral solids except for products that must be dispensed in original containers, must be dispensed in compliance packaging 3. Options include punch or bingo cards, multiple dosage cards (multiple medications in each bubble), pouch or pillow packages with one or multiple medication in each package. 4. Patients with unstable chronic conditions may need to have medication dispensed for less than 30 days to avoid delivery of separate packaging for new orders and repackaging of other medications. 5. Products such as insulin, creams and ointments, and ophthalmic products may need to be dispensed in more than a 30-day supply
IV Medications	<p>NLTCPs must have the capacity to provide IV medications to the LTC resident as ordered by a qualified medical professional. NLTCPs must have access to specialized facilities for the preparation of IV prescriptions (clean room). Additionally, NLTCPs must have access to or arrangements with a vendor to furnish special equipment and supplies as well as IV trained pharmacists and technicians as</p>	<ol style="list-style-type: none"> 1. Must have the capacity to provide IV medications regardless of setting including LTC pharmacy at home. 2. Pharmacy may subcontract or make arrangements with a hospital, home infusion, or company that provides IV services to meet this requirement. The pharmacy may provide IV medications, equipment and supplies as needed. The pharmacy can install a clean room or IV hood or may provide prepackaged

	required to safely provide IV medications.	products that do not require a sterile hood to be installed in the pharmacy.
Compounding /Alternative Forms of Drug Composition	NLTCPs must be capable of providing specialized drug delivery formulations as required for some LTC residents. Specifically, residents unable to swallow or ingest medications through normal routes may require tablets split or crushed or provided in suspensions or gel forms, to facilitate effective drug delivery.	<ol style="list-style-type: none"> 1. Must have the capacity to provide ordered compounds. 2. Most of the compounds used in long-term care are not sterile (i.e. combining two creams). 3. Compounds can be outsourced to a pharmacy specializing in compounding or sterile compounds if they are required.
Pharmacist On-call Service	NLTCP must provide on-call, 24 hours a day, 7 days a week service with a qualified pharmacist available for handling calls after hours and to provide medication dispensing available for emergencies, holidays and after hours of normal operations.	<ol style="list-style-type: none"> 1. Must be able to provide pharmacy services to the patient 24/7 365 days a year. A pharmacist must be available to take a telephone call from the patient or caregiver 24/7 365 days a year. 2. Services to provide medications in after-hours situations can be provided by the pharmacy or subcontracted with a backup pharmacy or a pharmacy network to meet the patient's emergency needs.
Delivery Service	NLTCP must provide for delivery of medications to the LTC facility up to seven days each week (up to three times per day) and in-between regularly scheduled visits. Emergency delivery service must be available 24 hours a day, 7 days a week. Specific delivery arrangements will be determined through an agreement between the NLTCP and the LTC facility. NLTCPs must provide safe and secure exchange systems for delivery of medication to the LTC facility. In addition, NLTCP must provide medication cassettes, or other standard delivery systems, that may be exchanged on a routine basis for automatic restocking. The NLTCP delivery of medication to carts is a part of routine "dispensing".	<ol style="list-style-type: none"> 1. Most LTC pharmacy at home patients should have at least one delivery per month plus any deliveries for changes in medications. Patients with frequent medication changes, especially patients recently discharged from the hospital or other facility may require more frequent delivery just like a skilled nursing facility. The purpose of LTC Pharmacy at Home is to ensure the patient receives the currently prescribed medications at the right time, right dose, and more frequent delivery of seven (7) or fourteen (14) days can assist in achieving this goal. 2. Deliveries must have proof of delivery in the form of common carrier/local courier delivery confirmation, or a receipt signed off by caregiver, family member or patient in the home either electronically or on paper or a picture of delivery. When a patient is onboarded to the service, the patient or caregiver should be educated on deliveries and appropriate actions to take if there is no one available to receive the medication delivery. 3. The pharmacy should facilitate timely delivery of medication.

<p>Miscellaneous Reports, Forms and Prescription Ordering Supplies</p>	<p>NLTCP must provide reports, forms and prescription ordering supplies necessary for the delivery of quality pharmacy care in the LTC setting. Such reports, forms and prescription ordering supplies may include, but will not necessarily be limited to, provider order forms, monthly management reports to assist the LTC facility in managing orders, medication administration records, treatment administration records, interim order forms for new prescription orders, and boxes/folders for order storage and reconciliation in the facility.</p>	<ol style="list-style-type: none"> 1. Prepare forms and other information for the patient, caregiver or family to assist them in ensuring the patient is aware of variances in their drug regimen such as remembering to take a medication such as Linzess® or an oral disintegrating tablet that may not be included in the regular packaged medications. 2. Special instructions for medications such as liquids (shaking the bottle), topicals, ophthalmic and otics, insulin, other injectables, etc. 3. Forms to keep track of dosing and other health monitoring such as blood glucose, blood pressure, heart rate, pulse ox, etc can also be provided and explained to the patient, family and caregiver. 4. Instructions on how to order medications especially prn (as needed) medications. 5. Forms to track usage of controlled substances for those that may need.
<p>Emergency Boxes</p>	<p>NLTCPs must provide “emergency” supply of medications as required by the facility in compliance with State requirements.</p>	<ol style="list-style-type: none"> 1. Emergency boxes are not needed for LTC Pharmacy at Home unless a state law dictates differently from the standard NCPDP definition under Level of Service (Level of Service Code (418-DI) value of “7” (Medical at home with special pharmacy services identical to Long Term Care beneficiaries with the exception of emergency kits). Reference: TELECOMMUNICATION VERSION D AND ABOVE QUESTIONS, ANSWERS AND EDITORIAL UPDATES DOCUMENTATION May 2021. A pharmacy must be able to provide emergency kits that are used in a LTC facility even if not engaged in facility-based care. 2. Prescribers may order specific medication for a patient to have on hand for use in an emergency situation, such as an epi-pen for possible allergic reactions.
<p>Emergency Logbooks</p>	<p>NLTCP must provide a system for logging and charging medication used from emergency/first dose stock. Further, the pharmacy must maintain a comprehensive record of a resident’s medication order and drug administration.</p>	<ol style="list-style-type: none"> 1. Since emergency boxes are not needed for LTC Pharmacy at Home services, logbooks would not be needed either