

HEMATOLOGY-ONCOLOGY ASSOCIATES OF CNY

DEPARTMENT: HOACNY	POLICY DESCRIPTION: Brown and White Bagging Policy
PAGE: 1 of 1	REPLACES POLICY DATED: n/a
EFFECTIVE DATE: January 2017	

SCOPE: All staff

DEFINITION: Brown and White bagging is the method of delivery by which physician-administered drugs are dispensed by a mail order pharmacy for a specific patient, shipped to the patient (brown bagging) or to the physician (white bagging) for administration, and generally paid under the pharmacy benefit rather than the medical benefit.*

PURPOSE: The responsibility and liability for purchasing, mixing and administering injectable medications resides solely with Hematology Oncology Associates of CNY (HOACNY). The legitimacy of original drug source and the appropriateness of subsequent storage and handling must be assured by HOACNY. HOACNY opposes the action of payers that require practices to obtain and receive injectable drugs from a vendor mandated by a payer.

POLICY:

1. HOACNY will not administer any drug to a patient that it does not purchase directly from either the manufacturer or a Verified-Accredited Wholesale Distributor (VAWD¹) accredited drug distributor.
2. If a patient's insurance requires the patient to receive an injectable from a payer mandated vendor, the following steps will occur:
 - a. The Physician and their team will be notified of the patient's insurance company vendor mandate.
 - b. HOACNY will notify the patient of their insurance company's vendor mandate and explain this policy.
 - c. HOACNY will contact the patient's employer, provide a copy of and explain the rationale of this policy.
 - d. HOACNY will contact the patient's insurance company and explain that we cannot administer any medication that is not purchased by HOACNY.
3. Every effort will be expended to provide patient care in the outpatient setting, however if HOACNY cannot obtain authorization to provide infusion services utilizing HOACNY purchased drug, then the patient will be treated in the hospital or in an alternative care setting.

* HOACNY is responsible and liable for purchasing, mixing and administering any injectable medication in our infusion centers. HOACNY does not oppose the utilization of the pharmacy benefit, only the payer mandating the patient receive a medication from an outside vendor. Payer mandated vendors have been shown to increase health care costs, as drugs are shipped ahead of time and may never be given due to changes in therapy, dose, duration or other unforeseen issues². HOACNY will only bill the patient's medical or pharmacy benefit for medications that the patient actual receives.

¹ <https://nabp.pharmacy/programs/vawd/>

² An Evaluation of Specialty Drug Pricing Under the Pharmacy and Medical Benefit. Artemetrx Specialty Drug Solution, March 2014