OUTPATIENT MEDICATION COPAY

RELEASE NOTES
Patch PSO*7*71

November 2001

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1. Introduction

Public Law 106-117, The Veterans Millennium Health Care and Benefits Act, increases the amount of copay charged for each 30-day supply of a drug prescribed and establishes an annual cap for copay charges. Patch PSO*7*71 enhances existing Outpatient Pharmacy V. 7.0 software to implement this functionality and adds new medication copay exemptions. The same checks that are currently performed to determine copay status at the time a new prescription is entered will also be performed at release. This includes release through Outpatient Pharmacy, Controlled Substance or Consolidated Mail Outpatient Pharmacy (CMOP) options, or background processes. The same checks will be applied whenever a prescription label is printed.

Responses to the medication copay exemption questions asked during order entry will be stored with each prescription record. The stored values are carried over whenever a presciption is renewed, copied or a new prescription created based on a change to an existing order.

This patch can only be run with a standard M operating system. For this patch to be fully functional, the Pharmacy Ordering Enhancement (POE) project software must be installed, which includes patches to Outpatient Pharmacy (PSO*7*46), Order Entry/Results Reporting (OR*3*94), Pharmacy Data Management (PSS*1*38), and Inpatient Medications (PSJ*5*50).

IMPORTANT NOTE

The Outpatient Pharmacy patch PSO*7*71 and CMOP patch PSX* 2*35 must be installed and implemented by facilities no later than December 31, 2001. On January 1, 2002, the new medication copay exemptions provided by patch PSO*7*71 will go into effect. Changes to increase the amount of medication copay and to establish the annual copay cap will go into effect when the regulations are approved and signed.

See the updated Outpatient Pharmacy V. 7.0 Technical Manual and User Manual for more detailed information.

2. New Features, Functions and Enhancements

Additional medication copay exemptions are established for outpatient medications prescribed to treat Vietnam-era herbicide/Agent Orange (AO) exposed veterans, veterans exposed to Ionizing Radiation (IR), veterans exposed to Environmental Contaminants (EC) during Persian Gulf War service, Military Sexual Trauma (MST), certain cancers of the Head and/or Neck (HNC), and for outpatient medications used as part of a VA approved research project.

The same checks that are currently performed to determine copay status at the time a new prescription is entered will also be performed at release. This includes release through Outpatient Pharmacy, Controlled Substance or Consolidated Mail Outpatient Pharmacy (CMOP) options, or background processes.

The same checks performed to determine copay status at release are applied whenever a prescription label is printed in order to display the current copay status of the prescription.

Several options on the Copay Menu have been enhanced which provide the user the ability to reset the Rx copay status, cancel all or specific charges and enter/edit responses to medication copay exemption questions prompted during order entry.

A separate activity log has been created to document any prescription activity related to copay, such as, removing charges, resetting the Rx copay status, or documenting that the annual copay cap has been met. NOTE: Any copay-related log entries made before this patch is installed will not be moved from the current Activity Log to the new Copay Activity Log.

The responses to medication copay exemption questions presented during outpatient order entry are stored with each prescription record. These values are carried over and displayed as defaults when a prescription is renewed or copied, or when a new order is created by editing a prescription.

A new security key, PSO COPAY, has been created to notify select staff in two situations:
1. Any time the *Exempt Rx Patient Status from Copayment* [PSOCP EXEMPTION] option is used to change the copay exemption status of an Rx Patient Status category. This notification is also sent to holders of the PSORPH key.
2. Whenever additional information is required to determine the copay status of a prescription at release. This notification is also sent to the provider of record and the person who finished the original prescription order.

3. Options and Actions

3.1 Options

The copay status of a prescription is re-evaluated whenever a prescription label prints in order to display accurate copay status information on the fill document. A copay status will no longer print on the label for partial fills.

Copay Menu [PSOCP MENU]
The *Remove Copay Charge* [PSOCP TRANSACTION] option is deleted from the Copay Menu.

The *Reset Copay Status* [PSOCP RESET COPAY STATUS] option is renamed *Reset Copay Status/Cancel Charges*. It provides the following enhancements:
- Incorporates the previous *Remove Copay Charge* [PSOCP TRANSACTION] option functionality.
- Allows cancellation of specific or all charges for the selected prescription.
- Allows entry/editing of responses to applicable medication copay exemptions (SC, MST, AO, etc).
- Identifies all fills with cancelled charges.
- Identifies fills with potential charges. These fills have not been billed due to the veteran having met his/her annual copay cap.
- Adds an entry to the new Copay Activity Log when a prescription's medication copay status is reset or medication copay charges are canceled.

3.2 Actions

A Mailman message is currently sent to PSORPH keyholders if an Rx Patient Status is set as exempt from copayment. A Mailman message will now be sent if any change is made using the *Exempt Rx Patient Status from Copayment* [PSOCP EXEMPTION] option. Holders of the new PSO COPAY key have been added as recipients to these messages.

Hidden Action
The Activity Logs (AL) hidden action is enhanced by the addition of a new Copay Activity Log. This new log lists the date, reason, prescription reference (Rx Ref), initiator, and comments for a copay activity. The same information can be displayed using the *View Prescription* [PSO VIEW] option.

Copay Status on Order Entry

This patch establishes several new medication copay exemptions. During order entry, the clinician will be asked if the outpatient medication is being prescribed for treatment related to applicable medication copay exemptions. In outpatient pharmacy backdoor order entry, these questions are presented until a response is entered that exempts the order from copay charges or until all questions have been asked.

Responses are stored with each prescription record and displayed as default values whenever a prescription is renewed through outpatient pharmacy or CPRS. The same defaults will be provided if a prescription is copied or a new order created due to an edit through outpatient pharmacy options.

The "SC" copay exemption question has been moved prior to the acceptance of the prescription in the order entry dialog. Any new medication copay exemptions that apply to the patient will appear in the same location.

Prescription Copay Status Checks on Release

The same copay status checks performed at order entry are now performed whenever a prescription fill is released. This includes releasing a prescription fill through any Outpatient Pharmacy or Controlled Substance software option, or when CMOP release data is sent back to the facility for filing. At release, entries may be added to the PRESCRIPTION file (#52) COPAY ACTIVITY LOG multiple (e.g., if the annual medication copay cap is reached or the copay status changes.) If the prescription copay status cannot be determined at release of a fill without additional information, a MailMan message will be generated for follow up detailing what information is required.

4. Reports and Profiles

A new COPAY ACTIVITY LOG is added with this patch. It displays the date that the copay action occurred , the reason for the activity, identifies the prescription fill (e.g. original, refill #1, etc.), who initiated the activity, and any additional details available. This log can be viewed through the Activity Logs (AL) hidden action in the *Patient Prescription Processing* [PSO LM BACKDOOR ORDERS] option or through the *View Prescriptions* [PSO VIEW] option in the *Rx (Prescriptions)* [PSO RX] menu. Entries are made to this log if:

- the *Reset Copay Status/Cancel Charges* [PSOCP RESET COPAY STATUS] option is used to reset a prescription's copay status or cancel copay charges;
- at release of a prescription fill if the annual cap has been reached or the prescription's copay status has been reset
- IB initiates a charge when an action causes the patient's annual medication copayments to fall below the cap.

NOTE: Any prescription copay activity prior to this patch are stored in the existing Activity Log and will not be moved to the new Copay Activity Log.

5. Files and Fields

Files
No files are added or deleted with this patch. New fields are added to the PRESCRIPTION file (#52) and the PENDING OUTPATIENT ORDERS file (#52.41).

New Fields

PRESCRIPTION file (#52):

COPAY EXCEEDING CAP (#106.6) This field contains the pointer to the IB COPAY TRANSACTIONS file (#354.71). There is data in this field only when a prescription is not billable because the patient has reached the annual medication copay cap at the time the fill is released.

The following fields are used to store responses when medication copay exemption questions are asked. The responses are used to evaluate a prescription's copay status and display as defaults on any new orders or renewals.

SERVICE CONNECTED (#116) This field identifies whether the prescription is being used to treat a service-connected (SC) condition.

MILITARY SEXUAL TRAUMA (#117) This field identifies whether the prescription is being used to treat Military Sexual Trauma (MST).

AGENT ORANGE EXPOSURE (#118) This field identifies whether the prescription is being used to treat a condition related to Agent Orange (AO) herbicide exposure during Vietnam service.

IONIZING RADIATION EXPOSURE (#119) This field identifies whether the prescription is being used to treat a condition related to ionizing radiation (IR) exposure during military service.

ENVIRONMENTAL CONTAMINANT EXPOSURE (#120) This field identifies whether the prescription is being used to treat a condition related to environmental contaminant (EC) exposure during Persian Gulf War service.

HEAD AND/OR NECK CANCER (#121) This field identifies whether the prescription is being used to treat head and/or neck cancer (HNC) due to nose or throat radium treatments while in the military.

REFILL sub-file (#52.1):

COPAY EXCEEDING CAP (#9.1) This field contains the pointer to the IB COPAY TRANSACTIONS file (#354.71). There is data in this field only when a prescription is not billable because the patient has reached the annual medication copay cap at the time the fill is released.

COPAY ACTIVITY LOG sub-file (#52.0107): This multiple is added to store a record of a prescription's copay updates and status changes. Sub-fields of this multiple are:

COPAY ACTIVITY LOG (#.01) This is the date when the activity occurred.

REASON   (#1) A code that indicates what caused the copay activity to occur.
  'A'   the annual medication copay cap was reached for a patient when this prescription
          was released.
  'R'   the prescription's copay status was reset due to a patient eligibility, copay
          exemption status change, etc.
  'I'   copay charge was initiated by the Integrated Billing application and not through
          the release function.
  'C'   existing copay charges were cancelled.
  'E'   the prescription is edited, e.g. Days Supply changed, which results in a copay
          charge adjustment.

INITIATOR OF COPAY ACTIVITY (#2) The name of the person responsible for the copay activity.

RX REFERENCE (#3) This field is used to indicate which prescription fill corresponds to the copay activity. 0 indicates the original fill and 1-11 indicates refills.

COMMENT (#4) Additional information will be entered here to detail why the copay activity occurred.

OLD VALUE (#5) This field is used to show the old copay status value for the prescription if the reason for the copay activity is set to 'R' 'Reset Copay Status'.

NEW VALUE (#6) This field is used to show the new copay status value for the prescription if the reason for the copay activity is set to 'R' 'Reset Copay Status'.

PENDING OUTPATIENT ORDERS file (#52.41)

The following fields are added to store responses when medication copay exemption questions are asked during CPRS order entry.

MILITARY SEXUAL TRAUMA (#106) This field identifies whether the prescription is being used to treat Military Sexual Trauma (MST).

AGENT ORANGE EXPOSURE (#107) This field identifies whether the prescription is being used to treat a condition related to Agent Orange (AO) herbicide exposure during Vietnam service.

IONIZING RADIATION EXPOSURE (#108) This field identifies whether the prescription is being used to treat a condition related to ionizing radiation (IR) exposure during military service.

ENVIRONMENTAL CONTAMINANT EXPOSURE (#109) This field identifies whether the prescription is being used to treat a condition related to environmental contaminant (EC) exposure during Persian Gulf War service.

HEAD AND/OR NECK CANCER (#110) This field identifies whether the prescription is being used to treat head and/or neck cancer (HNC) due to nose or throat radium treatments while in the military.

6. Other Functionality

A new key, PSO COPAY, is created to send a MailMan notification under two circumstances. These should be reviewed when determining who should be assigned the key.

1. When the prescription copay status cannot be determined at release, holders of the PSO COPAY key, the provider of record, and the person who finished the order are sent a message that additional information is needed to make a final determination of the prescription copay status. The message contains the patient name, SSN (last 4), prescription number, drug name, pharmacy division, information regarding the copay status change and what information requires feedback/review. Recipients of the message are asked to follow up on information needed. The appropriate pharmacy staff will take the additional information provided and make changes if needed, such as resetting the Rx Copay Status, entering a value for any of the medication copay exemption responses and/or removing charges. The missing information needs to be entered using the *Reset Copay Status/Cancel Charges* [PSOCP RESET COPAY STATUS] option. If this is not done, the same message will be sent as subsequent prescription fills are released.

2. Holders of the PSO COPAY key, along with holders of the PSORPH security key, are notified whenever the *Exempt Rx Patient Status from Copayment* [PSOCP EXEMPTION] option is used to change the copayment exemption for an Rx Patient Status.

Medication copay exemption prompts on renewals of outpatient medication orders
When a prescription is renewed (including speed or barcode renewals), any stored response to a medication copay exemption from the original prescription is displayed as the default. If there is no stored value for the Service Connected prompt, the current status stored in the in the COPAY TRANSACTION TYPE field (#105) of the PRESCRIPTION file (#52) displays as the default. If any of these prompts has a default value that would result in a 'No Copay' status for a prescription and that default is accepted, no additional medication copay exemption prompts will display, even if they apply. The user can edit these defaults if necessary. If editing an order causes the Orderable Item to change, a message displays on the user's screen noting that the defaults that follow should be reviewed.

The message that is displayed to the pharmacy user when finishing an outpatient medication order entered through CPRS indicating whether the order is flagged as SC or NSC, based on the SC condition prompt has been modified. The message now indicates whether the outpatient medication order is COPAY or NO COPAY based on responses to all applicable medication copay exemptions entered by the clinician through CPRS.

Labels
The copay status of a prescription will be re-evaluated whenever a prescription label is printed or reprinted to minimize the possibility of an incorrect copay status displaying on a label.

Because copay is never charged for a partial prescription fill, no copay status will be displayed on the fill document generated for a partial fill.

Setting up Investigational Drugs

Investigational drugs are already copay-exempt. A medication copay exemption has been established to include any drug dispensed as a part of a VA approved research project. This includes drugs approved by the FDA and used in a VA approved research study, such as a comparative study of angina drugs. It also includes any medications that are part of the VA approved research project, but may not be supplied by the study.

Marking a drug for use as part of a VA approved research project exempts any prescriptions entered for it from copay charges. to do this, existing Pharmacy Data Management (PDM) options must be used to add an "I" to the DEA SPECIAL HDLG field (#3) of the DRUG file (#50).

If a drug is approved by the FDA and is dispensed by the facility both for patients not enrolled in a research project and for patients within a VA Approved Research Project, an additional entry will need to be created in the local DRUG file (#50) for the study drug and an "I" entered in the DEA SPECIAL HDLG field (#3) to identify it as an Investigational Drug. A corresponding Orderable Item will also need to be created. It is recommended that a standard naming convention be used to identify all study drugs.

> NOTE: If a site wants to match a drug marked for investigational use to the National Drug File for order checks to be performed, the site should first match the drug and then enter an "I" at the "DEA SPECIAL HDLG" prompt. Once matched to NDF, however, the drug can no longer be assigned a VA DRUG CLASS of 'IN000.'

Post-Installation Routine

A post-installation routine is included in patch PSO*7*71 to review prescriptions entered over the last year and to populate, whenever possible, the new SERVICE CONNECTED (SC) field (#116) of the PRESCRIPTION file (#52). This routine queues a background task to populate the new SC field based on the following criteria. If the COPAY TRANSACTION TYPE field (#105) of the PRESCRIPTION file (#52) is set to "2," this indicates that the Service Connected question was asked for this prescription, and the response was "NO." In these cases, the software will set the new SC field to "NO." If the COPAY TRANSACTION TYPE field (#105) of the PRESCRIPTION file (#52) is null, and the drug is not marked as a supply or as an investigational drug, and the Rx Patient Status of the prescription contains "50," and either the "<" character or the words "LESS THAN" (for 'SC LESS THAN 50%'), and the COPAY INCOME EXEMPTION STATUS field (#.04) of the BILLING PATIENT file (#354) is set to "NON-EXEMPT, " then the software will set the new SC field to "YES."

If a prescription does not match either situation, the new SC field will be left blank.

When the job is complete, a mail message will be sent to the person who installed the patch.

Example of post-installation mail message:

```
Subj: Outpatient Pharmacy Copay Job  [#87390] 13 Nov 01 12:24   3 lines
From: OUTPATIENT PHARMACY COPAY INSTALLATION  In 'IN' basket.   Page 1
----------------------------------------------------------------------------
The background job for the Outpatient Pharmacy Copay patch (PSO*7*71)
is now complete. The SERVICE CONNECTED field in the PRECRIPTION file
has been populated for all applicable prescriptions.
```

7. Impacts to Other Packages

Interactions with Clinician Order Entry Through CPRS

Outpatient Pharmacy software provides CPRS the previously entered medication copay exemption responses to display as defaults to the provider on renewals. Outpatient Pharmacy identifies which medication copay exemptions questions that the clinician must be prompted when entering/renewing an outpatient medication order through CPRS.

Interactions with Integrated Billing (IB)

Integrated Billing identifies copay charges that have been cancelled and potential charges that have not been billed due to the annual copay cap. Whenever specific actions are taken, e.g. removal of a copay charge, that result in the veteran's annual medication copayments falling below the cap, IB will initiate a copay charge for a fill that was identified as a potential charge. This activity is logged in the new copay activity log. New charge removal reasons have been added to the IB CHARGE REMOVE REASONS file (#350.3) for the new medication copay exemptions (e.g. MST, AO) and annual copay cap.

Interactions with Patient Information Management System (PIMS)

Identification of veterans for which the new medication copay exemptions apply is provided by PIMS. Outpatient Pharmacy software displays these as questions to the pharmacist on outpatient medication order entry/renewal.

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