

NCPA 2018 Mail Order Survey Profile

SUMMARY:

Part D patients comprise a significant portion of community pharmacists' patient base. According to the most recent NCPA Digest benchmarking survey, the mean percentage of total prescriptions dispensed under Medicare Part D by respondents is 36%. The NCPA Digest also reports that the mean total number of Part D prescription filled by a community pharmacy in the past year was 21,508 prescriptions.

A February 2018 survey of members of the National Community Pharmacists Association – independent pharmacy owners – provided the following data on the effects of CMS changing its current policy on mail-order refill consent, further diluting the important guardrails that CMS has implemented to promote patient safety and discourage fraud, waste, and abuse in the Part D program.

- A large proportion of pharmacists said that following the 2014 changes in Part D plans, they saw a decline in patients coming into the pharmacy with unused mail order medications.
 - 39% cite a decline in patients coming into the pharmacy with unused mail order medications.
 - 53.9% cite about the same or more patients came into the pharmacy with unused mail order medications.
 - 7.1% cite no recognizable change either way.
- A majority of pharmacists reported that patients came into the pharmacy with the same or more of unused mail order medications, following CMS' relaxation of patient consent requirements for 2016 Part D plans.
 - 70.6% cite about the same or more patients came into the pharmacy with unused mail order medications.
 - 18.7% cite a decline in patients coming into the pharmacy with unused mail order medications.
 - 10.7% cite no recognizable change either way.

SELECT EXAMPLES CITED BY SURVEY RESPONDENTS:

NCPA received over 116 pages of examples from respondents on several issues related to mail order prescriptions seen at their pharmacies. It is important to note this is just a summary of the types of responses from respondents, but the following are categories of examples frequently cited by respondents in the survey.

- **Typical examples of patients coming into the pharmacy with unused mail order prescriptions:**

- Patients state they have prescriptions changed or modified requiring new prescriptions. They receive a shipment of a previous dose for a 90-day supply, then get their new medication the next day. If the pharmacy had been monitoring more closely they would be preventing the patient from being confused about which medication they are to be using.
 - We are a registered take back agent for the DEA and have disposal boxes in 3 of our locations. Our main store has had the box for over a year and we have sent back (for destruction) roughly 1,200 pounds of waste. Just from looking at the box prior to sealing it up, the majority of returned medication stems from mail order pharmacies. We are a small town (roughly 25,000) with 1200 lbs. of waste for 1 store.
 - Patients come in every couple of weeks with bags full of medications to dispose of. Garbage bags! Two instances in the last month cost tens of thousands. One was 2 kitchen sized garbage bags of [inhalers] and the other was 103 boxes of [injectables].
 - We continuously have patients bringing in 90-day supplies of unused medications - i.e. 270 tabs, 360 tabs. In addition, patients come in and ask us to discard and tell us they never ask for them. The patient also expresses that they don't know what meds to take first due to accumulation.
 - A patient's medication strength was changed, but mail order sent her refills on BOTH strengths. The patient contacted mail order but was told to discard the unused strength.
 - Recently I had a patient that was on a cancer medication that he was supposed to stop. He was then shipped an extra 90-day supply of the medication that he did not need. Drug cost was about \$27,000 of a drug that he will now never use.
- **Examples of unused mail order prescriptions sent to patients who were deceased:**
 - Today, I was brought in 36 mail order prescription bottles (22 unopened with seal intact) and one unopened inhaler for a single patient who passed away last week. The total invoice pharmacy cost of this unused medication for this patient was \$1,811.78. Unfortunately, this is the normal, not an exception. I have started taking pictures when this occurs. This is dangerous to the patient and to anyone in the household, as well as expensive to the healthcare system.
 - Patient caregivers want me to dispose of months of expired meds such as diabetic meds after the family member dies and tells me the meds just kept coming no matter how many times [the family] told [the insurance company] they had plenty.
 - The most common example that repeats often is when patients pass away, yet their family continues to receive refills in the mail. This continues even after the family calls the PBM to cancel the prescriptions.

- I have had several patient's families that have brought in bags of inhalers, nose sprays, insulin and prescription vials of medications that their family member had due to mail order just sending it out every 90 days or less. In some cases, the patient had passed away and the family wanted to show us the accumulation (or waste) of all the medications and then they wanted to know what to do with them now.
- **Examples of difficulties with patients trying to cancel mail order prescriptions:**
 - An 80 year old couple struggled [for] 7 months to get out of mail order. They are fully cognizant of the process. Their requests were being ignored.
 - We have patients that have called their mail order provider literally begging them to stop sending supplies they don't need. Even when they do NOT consent to the reorder, they receive it any way.
 - In general, we are seeing chronic medication continue to be shipped even though some patients are non-compliant and has plenty of medication left. Also, where medication dosage or drug has changed, [the mail order program] continue[s] to ship the old auto refill medications.
 - To get [a] refund is impossible and the patient [is] being sent to goose chase, shuttled from person to person without any resolution.
 - One of my elderly customers who has dexterity problems as well as vision problems is diabetic. He has to use a diabetic testing device that speaks the results to him. A mail order Pharmacy, that he doesn't remember signing up with, keeps sending him test strips that do not work with the meter he uses. He has asked them to stop repeatedly and even has me call them to try to explain the situation. The last box that was delivered was left out in the road and a neighbor brought it to him.
- **Examples of the types of unused medications that patients are bringing to pharmacies from mail order programs:**
 - Diabetes blood pressure and cholesterol medications. Sometimes the doctor changes the prescription, but mail order doesn't receive the new information and just mails the old medications automatically.
 - Customers complain that they received medication that was not ordered by them, many times meds that had been discontinued by their provider. Most of the overages are inhalers, eye drops, etc.; medications that are prepackaged and difficult to determine a correct days supply.
 - We continue to see large quantities of diabetic testing supplies that are shipped to patients despite their asking to stop them. They sign for packages without knowing what is in them. We see too much waste with the 90-day supply to patients. They either fail to take it correctly and still get it "on time" or the

medication has been changed. I understand the need for compliance, but just putting a 90 day supply in the home does not address the real problem.

- **Examples of patients that are coming into the pharmacy with unused mail order prescriptions recounting the patients' frustration with attempting to obtain refunds:**
 - Some patients have complained that the mail order companies want their credit card and then they send some products that have higher copays due to the brand of the drug that was chosen.
 - Patients complain that they are receiving medications that they did not order and state that they are charged for them. They state that the mail order pharmacy will indicate that the patient has given consent for the med to be sent and therefore the patient is responsible for the cost.
- **Examples of patients coming into the pharmacy with discontinued prescriptions that were sent to the patient via mail order programs:**
 - Patient brought in prescriptions that the doctor discontinued, and mail order still sent to patient. Patient did not order the medications and had to call them and ask them why they sent them.
 - Patients reports "refrigerator full of insulins" and "mail order keeps auto sending medications that my Doctor has discontinued."

For more information, contact NCPA Health Care Economist Leon Michos at leon.michos@ncpanet.org.