

ICHHP Position Statements - Outside Medications Supplied by an Outside Pharmacy (White or Brown Bagging)

The Illinois Council of Health-System Pharmacists (ICHHP) adopts the press release statement from the American Society of Health-System Pharmacists (ASHP) regarding payer-mandated white bagging and applies this stance to brown-bagging, as well.

The ASHP press release statement dated March 2021 reads as follows:

"ASHP stands opposed to payer-mandated white bagging models that jeopardize optimal, safe, and effective medication use. It is ASHP's position that payer-mandated distribution models that require clinician-administered drugs to be dispensed exclusively via third-party specialty pharmacies are placing patients at risk and threaten to compromise organizations' well-established practices intended to ensure patient safety. Additionally, white bagging negatively impacts pharmacists' ability to validate medication integrity and maintain oversight of storage and handling. Further, by sidestepping well-established supply chain procedures, white bagging disrupts efforts to maintain adherence with protocols designed to ensure patient safety, quality, and continuity of care.

Health systems are committed to providing patients with the highest quality of collaborative multidisciplinary healthcare in an environment that enables swift and nimble selection of the most appropriate therapy at the correct dose. Unfortunately, increasingly frequent and restrictive payer-mandated white bagging of clinician-administered medications is unnecessarily threatening those commitments."

ASHP's Model White Bagging Legislation states that a health benefit issuer **shall not** (1) interfere with the patient's right to choose to obtain a clinician-administered drug from their provider or pharmacy of choice; (2) require clinician-administered drugs to be dispensed by a pharmacy selected by the health plan; (3) limit or exclude coverage for a clinician-administered drug when not dispensed by a pharmacy selected by the health plan, if such drug would otherwise be covered; (4) require that an enrollee pay an additional fee, higher copay, higher coinsurance, second copay, second coinsurance, or any other form of price increase for clinician-administered drugs when not dispensed by a pharmacy selected by the health plan; (5) require a specialty pharmacy to dispense a clinician-administered medication directly to a patient with the intention that the patient will transport the medication to a healthcare provider for administration.³

Definitions:

"White bagging" refers to the distribution of patient-specific medication from a pharmacy, typically a specialty pharmacy, to the physician's office, hospital, or clinic for administration by a health care provider who is authorized under state law to administer the medication. It is often used in oncology practices to obtain costly injectable or infusible medications that are distributed by specialty pharmacies and may not be available in all non-specialty pharmacies.¹ White bagging typically applies to clinician-administered drug, which cannot reasonably be self-administered by the patient for whom the drug is prescribed, or by an individual assisting the patient with self-administration of the drug.

"Brown bagging" refers to the dispensing of a medication from a pharmacy (typically a specialty pharmacy) directly to a patient, who then transports the medication(s) to a healthcare facility for administration by a health care provider who is authorized under state law to administer the medication.¹

References:

1. White and Brown Bagging Emerging Practices, Emerging Regulation. April 2018. NABP. https://nabp.pharmacy/wp-content/uploads/2018/04/White-Bagging-and-Brown-Bagging-Report-2018_Final.pdf (last accessed 11/19/2024)
2. ASHP Press Release on White Bagging. 3/17/21: <https://news.ashp.org/news/ashp-news/2021/03/18/ashp-stands-opposed-to-payer-mandated-white-bagging> (last accessed 11/19/2024)
3. ASHP's Model White Bagging Legislation. [https://www.ashp.org/ASHP's Model White Bagging Legislation](https://www.ashp.org/ASHP's%20Model%20White%20Bagging%20Legislation) (last accessed 11/19/2024)

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