

Department of Veterans Affairs

Memorandum

Date: November 21, 2006

From: Deputy Under Secretary for Health Operations and Management (10N)


Subj: Low Cost Prescriptions for Generic Drugs

To: Network Director (10N1-23)

1. In late September 2006, Wal-Mart began a pilot in the Tampa, Florida area to provide \$4 prescriptions for 30-day supplies of selected generic drugs. The pilot was quickly expanded throughout the state of Florida and is now available in 27 States. Approximately one dozen other large regional and national retail pharmacies are offering similar services.
2. Veterans subject to the \$8 VA prescription copayment (for each 30-day supply of medication) are expressing interest in obtaining prescriptions from non-VA sources in order to obtain savings.
3. VHA has convened a work group to examine options for making generic drug co-payments more affordable for veterans. Assuming an acceptable option will be developed and approved, it will take time to implement approved changes.
4. In the interim, the following guidance is provided to assist VHA staff:
 - a. VA pharmacy staff are prohibited from transferring prescriptions to private sector pharmacies, either telephonically or by other means such as FAX and e-mail.
 - b. VA practitioners are permitted to write prescriptions for veterans to be filled in private sector pharmacies, if they meet all prescribing requirements for the state where the prescriptions will be filled. When doing so, they must take action to cancel the VA prescriptions to prevent patients from receiving excessive quantities and to record the prescriptions written for non-VA filling in the progress note.
 - c. Drug Enforcement Administration (DEA) registration numbers assigned to VA medical care facilities must not be used as practitioner identifiers for the purpose of writing prescriptions to be filled in non-VA pharmacies. Prescribers' personal DEA numbers are to be used for this purpose if required by the non-VA pharmacy. Fees for personal DEA numbers are waived for federal employees, who can register via the DEA website.
 - d. Although it is not encouraged, practitioners are permitted to telephone prescriptions to private pharmacies at VA patients' requests, if they meet all State requirements for the state in which the prescription is being filled. Telephoning or otherwise transmitting prescriptions to private pharmacies may not be delegated to other clinical staff and must be documented in the medical record.
 - e. In cooperation with VHA Forms staff, VA facilities can develop local prescription blanks to write prescriptions to be filled in non-VA pharmacies. However these blanks are subject to the same security and control requirements as the VA prescription blanks used for internal Schedule II (C-II) prescribing.

- f. It is an expected part of clinical care for practitioners to obtain and record a complete list of all medications currently used by patients. The Non-VA medication file has been developed and should be used for the purpose of documenting medications obtained outside the VA. It is particularly important that any medications prescribed by VA practitioners for outside fill are documented in this file.

- g. Should you require further information, please contact Michael Valentino, RPh, MHSA at 202-273-5086


William F. Feeley, MSW, FACHE