

Hospital of the University of Pennsylvania Clinical Practices of the University of Pennsylvania POLICY MANUAL	Number: 1-09-07 Page 1 of 4
SUBJECT: SAMPLE MEDICATION VOUCHER PROGRAM IN THE CLINICAL PRACTICES OF THE UNIVERSITY OF PENNSYLVANIA	Effective: 12/20/06

KEY WORDS:

Sample medications
 Indigent medications
 Medication vouchers
 “Starter Packs”

SEE ALSO:

#1-12-14
 “Pharmaceutical
 Company Representative
 Activity”

Policy

Sample medication vouchers are stored, controlled, and distributed to patients seeing physicians in the Clinical Practices of the University of Pennsylvania (CPUP) sites in accordance with University of Pennsylvania Medical Center policies and procedures.

Purpose

The purpose of this policy is to regulate the handling of sample medication vouchers in CPUP clinical practice sites associated with the Hospital of the University of Pennsylvania (HUP) campus.

Scope

This policy applies to all employees of CPUP as well as other hospital or university personnel using the CPUP sites. All pharmaceutical company representatives are also expected to abide by this policy while on CPUP sites. This policy does not apply to indigent medications or starter packs.

Implementation

Dissemination and interpretation of this policy is the responsibility of the management personnel of CPUP. Implementation is the responsibility of CPUP and is coordinated jointly by the respective director/designate and the Director of the Department of Pharmacy Services.

Definitions

Sample – for the purposes of this policy, a sample is a supply of a medication provided to a physician free of charge for general use. That is, medication provided without a patient specific prescription.

Indigent medications – for the purpose of this policy, the term “indigent medication” refers to a medication provided free of charge to a specific patient following a valid prescription due to need for financial assistance.

Starter pack – for the purposes of this policy, a starter pack is one or more doses of a prescribed medication given to the patient by the prescriber from the site’s unit dose stock. These medications are dispensed so that the patient can take the initial dose(s) before he/she is able to get a full prescription filled.

SUPERSEDES: 12/15/03 Sample Med Voucher 2006.doc	ISSUED BY: /s/ M. Sean Grady, M.D.
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Procedure

1. A valid prescription for the drug in the specified sample amount must be written before vouchers are dispensed.
2. Sample medication vouchers may be obtained from a pharmaceutical representative only if a practitioner licensed under state law to prescribe drug products requests them. **No** physical samples of medications will be allowed in the CPUP practices.
3. Sample medication vouchers are to be secured in each CPUP clinical practice area with access limited to licensed personnel.
4. Sample medication vouchers may be distributed by practitioners licensed under state law to dispense or distribute medications. This shall consist of physicians, dentists, pharmacists, and certified registered nurse practitioners and physician assistants with prescriptive authority.
5. Medical Director/Designate of CPUP:
 - a. Shall be responsible for:
 - i. Deciding if sample medication vouchers are to be allowed in the department's Clinical Practice sites;
 - ii. Defining an inventory of sample medication vouchers which are stored and dispensed from the department's Clinical Practice sites;
 - iii. Providing secure locked storage space for sample medication vouchers
6. Practice Director/Designate:
 - a. Shall be responsible for:
 - i. Designating person(s) who shall be responsible for receiving and storing formulary sample medication vouchers.
 - ii. Maintaining a list of the sample medication vouchers received from the pharmaceutical representatives.
 - iii. Organizing and maintaining the sample medication voucher cabinet.
 - iv. Notifying the pharmaceutical representatives when additional sample medication vouchers are needed.
 - v. Ensuring that the sample medication voucher storage area is monitored and secured.
7. Pharmaceutical Representative:
 - a. Shall be responsible for:
 - i. Adhering to the Pharmaceutical Company Representative Activity policy established for HUP/CPUP #1-12-41;

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- ii. Consistently supplying formulary sample medication vouchers only upon request of a licensed prescriber;
- iii. Supplying non-formulary sample medication vouchers for a specific Clinical Practice site only upon request of a licensed prescriber;

8. Licensed Prescriber:

- a. Shall be responsible for:
 - i. Receiving sample medication vouchers from the pharmaceutical representatives;
 - ii. All dispensing of sample medication vouchers to patients along with a valid prescription for the designated medication and amount to be dispensed.
 - iii. Reviewing patient’s complete medical history and medication profile for allergies, potential drug/disease, drug/drug, or drug/food interactions prior to dispensing the medication sample voucher and prescription to the patient;
 - iv. Documentation of the sample medication vouchers dispensed to a patient which includes: date, medication name, patient name, and physician name in the patient’s medical record.
 - v. Considering the following prior to dispensing a non-formulary sample medication voucher:
 - 1. The lack of availability of the medication from the HUP Outpatient Pharmacy
 - 2. The lack of availability of the medication from the HUP Inpatient Pharmacy, should the patient be admitted;
 - 3. The potential increased expense to the patient that a non- formulary medication may incur;

9. Pharmacy Designate:

- a. Shall be responsible for:
 - i. Providing information related to formulary status of medication, costs for formulary medications, indigent program availability, and other relevant information for the CPUP Practice site;
 - ii. Maintaining a list of authorized “sample medication voucher storage areas”

10. Pharmacy & Therapeutics (P&T) Committee

- a. Shall be responsible for:
 - i. Reviewing the proposed sample medication voucher inventory for each CPUP Clinical Practice site and making recommendations regarding restriction of certain medication vouchers;
 - ii. Periodic review of compliance with the sample medication and storage procedures that will occur under the coordination of the administrative

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leadership of the CPUP sites, the P&T committee and the Department of Pharmacy;

iii. Granting any exemptions as described in this policy.

11. The Medical Director/Designate and the Practice Director/Designate of the CPUP clinical practice found not to be in compliance with this policy will be notified in writing of the deficiencies and provided 30 days to correct the problem(s). Sample medication vouchers may be removed from the designated clinical practice area for up to six months should there be continued non-compliance upon re-inspection. The Office of CPUP Patient Services will assess compliance with this policy and report findings to the Director of the Department of Pharmacy Services.

Developed: February 2003

P&T Approval: May 2003

Medical Board Approval: December 2003

Medical Board Approval: December 2006

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