

	Department: Corporate Compliance	Policy No.: 605
	TITLE: HOME INFUSION - PATIENT COUNSELING	
Effective Date: 1/1/15	Revised: 1/1/15	

HOME INFUSION–PATIENT COUNSELING

SCOPE:

All Ascension At , LLC colleagues. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time associates, independent contractors, clinicians, officers and directors.

PURPOSE:

A patient’s (or the patient’s care giver’s) complete understanding of how to use a prescription medication is critical to successful adherence to medication therapy. The purpose of this Policy is to ensure that Ascension At Home, LLC and its subsidiaries (the “Company”) have established processes to ensure that patients receive essential information related to the medication that is being dispensed.

POLICY:

It is Company policy to ensure that the Company’s Pharmacy Operations comply with both federal and state requirements concerning the counseling and interaction between a pharmacist and a patient (or the patient’s caregiver).

PROCEDURE:

General Principles to Patient Counseling

- The Company’s pharmacy and pharmacists will offer patients (or a patient’s caregiver) receiving a prescription, regardless of whether the prescription is new or a refill, the opportunity for counseling.
- While federal and state laws generally require that that an offer to counsel be made, pharmacists are not required to provide counseling to a patient (or patient’s caregiver) who refuses the offer.
- The pharmacist should document that counseling was either offered and accepted or refused. The pharmacist should also document the perceived level of the patient’s (or caregiver’s) understanding. All documentation should be safeguarded to respect patient confidentiality and privacy and to comply with applicable state and federal laws.
- The content of an education and counseling session with a patient or caregiver is to be tailored to the individual patient based on the pharmacist’s professional judgment. The pharmacist’s responsibility is to ensure that the patient understands

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the intended use of their medications, the goals of therapy, and safety concerns and convenience of use. Other information that could be discussed might include:

1. The medication's trade name, generic name, common synonym, or other descriptive name(s) and, when appropriate, its therapeutic class and efficacy.
 2. The medication's use and expected benefits and action.
 3. The medication's expected onset of action and what to do if the action does not occur.
 4. The medication's route, dosage form, dosage, and administration schedule (including duration of therapy).
 5. Directions for preparing and using or administering the medication.
 6. Action to be taken in case of a missed dose.
 7. Precautions to be observed during the medication's use or administration and the medication's potential risks in relation to benefits.
 8. Potential common and severe adverse effects that may occur, actions to prevent or minimize their occurrence, and actions to take if they occur, including notifying the prescriber, pharmacist, or other health care provider.
 9. Potential medication-medication (including nonprescription), medication-food, and medication-disease interactions or contraindications.
 10. Prescription refill authorizations and the process for obtaining refills.
 11. Proper storage of the medication.
 12. Proper disposal of contaminated or discontinued medications and used administration devices.
- Providing written information to a patient as a supplement to oral counseling ensures patient access to important medication information after he or she leaves the pharmacy. Some States have laws that require the provision of written information to a patient under specific circumstances and the Company will comply with these State requirements.

Counseling When the Patient Is Not Present

- When prescriptions are delivered or mailed to patients, pharmacies are not exempt from the patient counseling provision of care.
- The Company shall have a process to offer patient counseling services when a patient is not present and such process shall comply with federal and state requirements. For example, one method to ensure compliance is to provide

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printed drug information that includes pharmacy business hours as well as a toll-free telephone number for patients to speak with a pharmacist.

Patients with Limited English Proficiency

- Depending on local and regional demographics, a Company pharmacy may interact with different degrees of non- English speaking patients. Some states require language services to be provided to limited English proficient patients. For example, some states require oral language translation services for medication labels, associated warning labels, and other written materials. The Company will comply with all federal and state laws concerning the offering of patient counseling in alternative languages when patients have limited proficiency in English.