



POINT-OF-CARE TESTING PHARMACY IMPLEMENTATION CHECKLIST

IDENTIFY WHICH TEST YOU WILL PROVIDE IN YOUR PHARMACY

Will you test for COVID-19, Flu A+B, Strep, or others? You will need to include the test type on your CLIA application.

The BD Veritor is currently available in [ABC Order](#). Purchase two rapid detection kits now and receive a **free digital reader**.* Note that BD test kits are not returnable.

*To take advantage of this offer, you must purchase item [#10260730](#) (BD #256095), which is for two COVID-19 + flu test kits (60 tests total) and one complimentary analyzer. Please search ABC Order by item number to ensure you're purchasing the correct item. Additional items that may also be purchased to enhance your POCT offering include:

- COVID-19 + flu test kits (30 count): [#10259885](#) (BD #256088)
- Strep test kits (30 count): [#10160653](#) (BD #256040)
- BD Veritor Plus System analyzer: [#10187251](#) (BD #256066)

ENROLL AS A CLIA-WAIVED TESTING SITE

- Complete [The CLIA application form](#), CMS-116 and mail it to the appropriate [state agency](#).

Additional information for obtaining a CLIA Certificate is available at the [Centers for Medicare and Medicaid website](#). (Source – [NCPA](#))

Timeline: Takes 2 -3 weeks to process, generally effective for 2 years

Cost: Approx. \$100 - \$200

COMPLETE MANDATORY TRAINING

- REQUIRED: OSHA Bloodborne Pathogen Training**

- 1 hour CE credit – available for \$10 on [GNPUniversity](#)
- Blood-borne pathogen training can be taken through the Red Cross, or with CPR training from any recognized entity that certifies healthcare providers for CPR requirements.

- OPTIONAL:** [Pharmacy-Based Point-of-Care Testing Certificate Program](#). [View upcoming trainings](#).

DETERMINE HOW YOU WILL OBTAIN PRESCRIPTIVE AUTHORITY FOR POINT-OF-CARE TESTS

- Reach out to your [state association](#) to determine exactly what is required in your state.

Obtaining a CLIA-waiver allows a pharmacist to perform a point-of-care test in the pharmacy. However, the test itself still needs to be ordered by an entity with prescriptive authority. Some states give the pharmacist the authority to order POCTs, and some states **do not**. If your state **does not**, then the pharmacy must obtain this authority according to the state's guidance. In many states this can be accomplished through a [Collaborative Practice Agreement](#). The patient can also present an order from a physician. [Click here for CDC CPA Resource](#).

Timeline: Varies

Cost: Varies

DEVELOP A TESTING PROTOCOL

Clearly document your standard operating procedures in writing. Some states may require that testing protocols be submitted for documentation.

PREPARE TO BILL FOR POINT-OF-CARE TESTING

Determine your pricing/billing strategy. If you will accept Medicare, Medicaid, or commercial insurance, additional steps are required (see below). Will the tests be cash only? If so, what does your pricing look like?

- CASH:** Consider the operating and supply costs of each test and desired profit level as you set your cash pricing. Conduct market analysis to determine what other entities in the pharmacy's service area charge for similar testing services.



- **MEDICARE:** To bill Medicare for point-of-care tests, you must enroll as an **independent clinical laboratory** by submitting a [CMS855B](#) enrollment application to your [designated MAC](#). To enroll online, [click here](#).
 - Even if you're already enrolled to bill Medicare and have a PTAN, **you must still enroll again** as an independent clinical laboratory. CLIA waiver must be approved prior to completing this enrollment process.
 - **Timeline:** Applications are processed in the order they are received.
 - **Cost:** Currently waived in response to COVID-19. Normally \$599
- **MEDICAID:** Contact your local state agency to determine billing contacts for your state
- **COMMERCIAL INSURANCE:** There are several billing and reporting solutions that facilitate medical claims billing for pharmacies. There is opportunity to seek reimbursement for each step of the testing, including obtaining the sample, processing the sample, and interpreting results. A billing and reporting solutions vendor can walk you through the process of seeking reimbursement for each step.
Medical billing and reporting vendors/solutions:
 - [EBS](#)
 - [FDS](#)
 - [Change Healthcare](#)
 - [Omnisys](#)
- **DEFINE WORKFLOW AND ASSIGN PHARMACIST AND STAFF ROLES**

Clearly define what will be handled by the pharmacist and what will be handled by the pharmacy staff.

 - Pharmacist Role
 - Assess patient to determine if POCT is appropriate
 - Interpret POCT results and educate patient on course of action needed based on the results
 - Technician/Intern Role
 - Review patient intake information for completeness
 - Collect appropriate vitals and other information to aid in pharmacist's assessment
 - Cashier Role
 - Provide information to patients on requested test pricing and expectations of service
 - Initiate process to collect patient intake information
- **DEVELOP A MARKETING STRATEGY**
 - Review the Point-of-Care-Testing Marketing Execution guide, available for *Good Neighbor Pharmacy* members on [GNP Brand Central Station](#).
 - Additional branded marketing materials are available for *Good Neighbor Pharmacy* members on [GNP Brand Central Station](#) and [SOCi](#). Good Neighbor Pharmacy members can also order store signage [here](#).
 - *Good Neighbor Pharmacy* members can take advantage of the point-of-care-testing marketing bundle in [GNP Brand Central Station](#). The bundle includes 1 poster, 1 window cling, 1 lawn sign, and 50 bag stuffers.
 - Identify the communication channels you can access to reach patients in your community (social media, call campaigns, in-store print marketing materials, etc.)
 - Keep social media channels up to date with details on testing availability, days/hours tests are available, scheduling guidance and more.
 - *Good Neighbor Pharmacy* members should work closely with your business coach and advertising manager on a marketing strategy.
- **DOCUMENT YOUR POST-TEST PATIENT CARE PLAN**
 - Determine whether your state allows pharmacists to treat and prescribe medication after a test. If you have a CPA, you may be able to prescribe per the CPA order.
 - If prescribing isn't an option, develop a workflow process for calling the patient's prescriber and asking for a prescription.



- ❑ Develop an OTC strategy. Consider the common symptoms a patient may be experiencing if they come in for a test. Determine exactly which specific OTC products you will recommend and make sure that your staff is familiar with these items.

- ❑ **DETERMINE REQUIREMENTS FOR REPORTING TEST RESULTS**
 - ❑ Reach out to your local health department to determine the requirements for reporting test results.
 - ❑ Methods for reporting results can vary depending on which type of testing device you use. Results may be reported through your pharmacy management system, the testing device itself, through your billing management solution, or manually.

- ❑ **DEFINE YOUR DOCUMENTATION PROCESS**
 - ❑ Determine how you will internally document testing and results. How will you maintain patient records? Will this be noted in your pharmacy management system? Does the testing vendor provide a patient portal that allows you to record and capture this information?

Additional Resources:

- CLIA State Agency Contacts:
<https://www.cms.gov/Regulations-and-Guidance/Legislation/CLIA/Downloads/CLIASA.pdf>

- State Association Directory:
<https://naspa.us/member-directories/>

- NCPA:
<https://ncpa.org/point-care-testing-poct>

- National Alliance of State Pharmacy Associations:
<https://naspa.us/resources/>