



August 5, 2024

University of California Health
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Oakland, CA 94607

health.universityofcalifornia.edu

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Re: Systemwide Review of Proposed Presidential Policy: Externally Supplied Medications in UC Outpatient and Clinic Settings

Dear Colleagues:

Enclosed for systemwide review are proposed revisions to Presidential Policy Externally Supplied Medications in UC Outpatient and Clinic Settings.

DSCSA, a federal law enacted in 2013, requires hospital pharmacies to keep track of the chain of custody and end-to-end product traceability (“track and trace”) for medications from the point of creation at the manufacturer to administration/dispensing to a patient. Since the law was implemented, UC pharmacy has worked to improve policies to ensure that medications can be tracked throughout their entire life cycle. One way that drugs have entered our system, outside of the usual purchasing procedure, is through a process called White Bagging, which is when a medication is sent over from an outside pharmacy contracted with the patient’s insurance plan. This process doesn’t allow UC to track the medication, and it can also lead to delays in patient care and wastage if the patient no longer needs the therapy. In 2020, UC created an interim policy to decrease this process, and other types of externally supplied medications, and after assessing our system status, UC pharmacy is ready to move to a full review of this policy. Having a policy in place allows UC to use our system leverage with insurers to find alternative mechanisms for procuring these medications for our patients that both follow the regulations and provide for patient care in the safest and most cost-effective way. Exceptions to the policy were included for medications received for patient first time education and in the case of patient assistance programs. This updated policy has been approved by all our Chief Pharmacy Officers.

Systemwide Review

Systemwide review is a public review distributed to the Chancellors, the Chair of the Academic Council, the Director of the Lawrence Berkeley National Laboratory, and the Vice President of Agriculture and Natural Resources requesting that they inform the general University community, especially affected employees, about policy proposals. Systemwide review also includes a mandatory, 90-day full Senate review.

Employees should be afforded the opportunity to review and comment on the draft policy. Attached is a Model Communication which may be used to inform non-exclusively represented employees about these proposals. The Labor Relations Office at the Office of the President is responsible for informing the bargaining units representing union membership about policy proposals.

We would appreciate receiving your comments no later than **November 4, 2024**. Please submit your comments to julianna.burton@ucop.edu. If you have any questions, please contact Julianna Burton at julianna.burton@ucop.edu.

Sincerely,

DocuSigned by:
David M Rubin
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David Rubin
Executive Vice President

Enclosures:

- 1) Draft Presidential Policy Externally Supplied Medications in UC Outpatient and Clinic Settings (clean copy)
- 2) Draft Presidential Policy Externally Supplied Medications in UC Outpatient and Clinic Settings (tracked-changes copy)
- 3) Model Communication

cc: President Drake
Provost and Executive Vice President Newman
Executive Vice Chancellors/Provosts
Executive Vice President and Chief Operating Officer Nava
Senior Vice President Bustamante
Vice President and Vice Provost Gullatt
Vice President and Chief of Staff Kao
Vice President Lloyd
Vice President Maldonado
Vice President Nelson
Vice Provosts/Vice Chancellors of Academic Affairs/Personnel
Deputy Provost Lee
Associate Vice President Matella
Deputy General Counsel Woodall
Assistant Vice Provosts/Vice Chancellors for Academic Personnel

Deputy Chief HR Officer and Chief of Staff Henderson
Executive Director Lin
Chief of Staff Beechem
Chief of Staff Levintov
Chief Policy Advisor McAuliffe
Director Anders
Director Chin
Director Weston-Dawkes
Associate Director Dicaprio
Associate Director Garcia
Associate Director Soria
Associate Director Teaford
Associate Director Woolston
Assistant Director LaBriola
Manager Crosson
Policy Analyst Durrin
Administrative Officer Babbitt
Vice President Zoanne Nelson
Policy Advisory Committee
Julianna Burton, Policy Owner