

Oncology White Bagging FAQ

Specialty Drugs Shipped from Pharmacies to Oncology Providers (“White Bagging”)

[Policy number - ORPTCOPS145.1224](#)

What is White Bagging?

The provider prescribes and orders the specialty medication from the specialty pharmacy to be sent directly to their office/facility for administration. The provider’s staff will need to prepare the drug in the office/facility. The provider ordering white bagged medications can be in or out of the Providence Health Plan Network.

Which specialty pharmacies are contracted (in network) with PHP for white bagging?

- Credena Health Specialty Pharmacy (Primary)
 - Phone: 855-360-5476
 - Fax: 503-215-8455
- Accredo Health Group (Secondary)
 - Phone: 877-222-7336
 - Fax: 866-579-4655

ONCOLOGY MEDICATIONS - EFFECTIVE 1/1/2025:

If white bagged, providers must use in network pharmacies: Credena Health Specialty Pharmacy and Accredo Health Group

- *Except for the following **rare** circumstances:*

Oregon House Bill (HB) 4012 allows oncology providers to prescribe oncology medications to be shipped from an out of network pharmacy of their choosing when the oncologist determines that:

- A delay in care would make disease progression probable
- The use of a pharmacy within the health benefit plan issuer’s provider network would:
 - Make death or patient harm probable; or
 - Potentially cause a barrier to the enrollee’s adherence to or compliance with the enrollee’s plan of care; or

- The timeliness of the delivery or dosage requirements necessitate delivery by a pharmacy that is outside of the health benefit plan issuer's provider network.
- If the oncologist believes any of the above will occur, their choice is not limited to the two contracted specialty pharmacies (Credena and Accredo) as with non-oncology medications.
- The member will not be penalized monetarily if the oncologist obtains their medication from an out of network pharmacy for healthcare professional required administration in the clinic or facility for the above circumstances.
 - OR HB 4012 applies to Oregon fully insured and these self-funded groups for whom PHP administers benefits: Clackamas County, PEBB, SAIF, and School District Trust.

What if the drug the provider wants to white bag is not listed on the policy?

Short answer- Drug list is a guide, work with specialty pharmacies if not on the list

Long answer- The policy has a table with drugs listed on it that can be white bagged. This list is a guideline of drugs that are commonly white bagged by providers. If a provider would like a drug white bagged that is not on the list, they should call Credena and Accredo to see if it is possible. The pharmacies will look at logistics, stability, ease of mixing and other properties in deciding.

Will the drugs still be viable if shipped from a specialty pharmacy?

- The specialty pharmacy will package the medication for shipping consistent with manufacturer recommendations.

What and how do the providers bill when the drug is white bagged?

- The provider can bill for the administration of the medication only.
- The provider may not bill for the full cost of the medication because they did not purchase it or dispense from their own supply (as would be the practice of buy and bill).
- For correct processing of the administration claim, the provider must include the HCPCS billing code for the medication with a billed amount of \$0.01, so that the administration can be tied to the drug that was administered.

Can White Bagging be done for Medicare patients?

Short Answer- Yes, but the Specialty Pharmacy cannot bill White Bagging under Part B coverage.

Medicare rules in Medicare Benefit Policy Manual, Publication 100-02, Chapter 15, sections 50.3 and 60.1 does not allow white bagging.

Long Answer-

Cannot bill under Part B

Pharmacies may not bill Medicare Part B for drugs furnished to a physician for administration to a Medicare beneficiary. When these drugs are administered in the physician's office to a beneficiary, the only way these drugs can be billed to Medicare is if the physician purchases the drugs from the pharmacy (buy and bill method). In this case, the drugs are being administered "incident to" a physician's service and pharmacies may not bill Medicare Part B under the "incident to" provision. (See Medicare Benefit Policy Manual, Publication 100-02, Chapter 15, sections 50.3 and 60.1.)

Can bill under Part D

CMS discourages the practice of "bagging" (there is also "clear bagging"). And while they have been aware of the practice for decades, they have never given guidance regarding disallowance of the practice. Regarding HOW these claims are to be billed, the guidance states that in this practice, they are NOT to be billed as Part B, but rather to Part D, as the cost gets shifted to the member under their Part D benefit.