

Standardized Exception & Review Process for Critical Access Pharmacy (CAP) Designation

1. Purpose

To establish a consistent, transparent, and equitable process for pharmacies requesting an exception to CAP designation criteria and the associated quarterly review process, as outlined in OAR 431-121-2000(4).

2. Standard CAP Designation Determination Process

A standardized quarterly review which is automatically conducted by OHA, in accordance with OAR 431-121-2000 (4), following these steps:

Initial Screening (Weeks 1-2)

- OPDP staff verifies pharmacy's location, ownership, and service offerings.
- Data analysis on high poverty census tracts for pharmacies.
- Cross-check with CAP-designated pharmacies and any new pharmacies in the region.

Committee Evaluation (Week 3)

OPDP staff, evaluates:

- Geographic access risks.
- Population considerations & service-based justification.
- Potential impact on community pharmacy access.
- Supporting documentation, if requested.

Final Decision & Notification (Week 4)

- The Director of OPDP approves.
- CAP designation list is published.

Pharmacies that lose CAP eligibility receive a 12-month transition period. This process ensures fair, data-driven decisions while maintaining flexibility for unique pharmacy access needs.

3. Exception Request Eligibility

Per OAR 431-121-2000 (4) (d), a pharmacy may be designated a CAP at the discretion of the OPDP Director. Pharmacies may apply for an exception if they do not meet standard CAP criteria automatically assessed by OHA. The pharmacy's [application](#) should demonstrate a **significant commitment to pharmacy access** including comprehensive answers to the following factors:

- **Geographic Justification:** Distance to nearest pharmacy & local access challenges.
- **Services Provided:** Compliance with CAP service requirements & additional services offered.

- **Medicaid Population Served:** Percentage of claims that are Medicaid prescriptions.
- **Community Impact:** Evidence of unmet pharmacy access needs.
- **Additional Justification:** Any unique circumstances affecting pharmacy viability such as unique community needs (e.g., underserved populations, university, high poverty census tract (HPCT) areas). Hours of Operation.

Completed exception request form for each pharmacy location must be emailed to oha.pharmacy@oha.oregon.gov. Questions can be to the same address.

4. Exceptions Decision Process

Upon submission of a complete Exception Request Form the OPDP Director intends to respond within 3 business days.

Initial Screening (Day 1)

- Ensure CAP exception request form is completed with comprehensive answers.
- OPDP Operations Manager and/or Community Pharmacy Liaison reviews and validates data points before providing to OPDP director.

Committee Evaluation (Day 2)

OPDP staff evaluates exceptions based on guidance which takes the following into account:

- Geographic access risks.
- Population considerations & service-based justification.
- Potential impact on community pharmacy access.
- Any additional justification provided by pharmacy.

Final Decision & Notification (Day 3)

- The Director of OPDP approves or denies the exception request.
- Pharmacy is issued letter outlining CAP exception request decision.
- This decision is subject to quarterly review as outlined in OAR 431-121-2000.

Pharmacies denied an exception may reapply for an exception due to, but not limited to, subsequent changes in services, and pharmacy closures.

5. Guidance For Exception Decision Making

Geography
1. On boundary of geographic parameter, nine miles or greater for closest pharmacy?
2. Immediately adjacent to HPCT? (meaning directly on boundary of High Poverty Census Tract)
Services Provided
1. Must provide all clinical services outlined in 431-121-2000 (4) offered? <ul style="list-style-type: none"> - provide access to immunizations; and - either <ul style="list-style-type: none"> o medication therapy management; or o pharmacist protocol-based prescribing
2. Interpretation & Translation Services?
3. Additional Clinical Services? <ul style="list-style-type: none"> - Programs to monitor and address gaps in care related to adherence, blood pressure monitoring, and hemoglobin A1C testing.
4. % of Medicaid <ul style="list-style-type: none"> - 10-20% Medicaid. - 21-30% Medicaid. - over 31% Medicaid.
5. Pharmacy hours extended to at least 6pm weekdays and one day on weekend?
6. Pharmacy provides after-hours access. (i.e. lockers, or phone access.)
7. Delivery at no charge?
Additional Justification
Provides compelling and detailed justification for exception request. This can include but is not limited to equity efforts, special populations served, seasonal travel considerations or partnerships that are verifiable.

This gives OPDP 10 distinct areas to assess in deciding on each exception request.

The geographic consideration is used to ensure parameters are not concrete cut offs. As noted by 9 mile and boundary descriptions for HPCT. It is also intended to have pharmacy conduct their own assessment of pharmacy access.

Under services provided area, we may collect data points, and this can impact status during quarterly/annual re-validation reviews.

If a change in CAP status is made, the pharmacy will be appropriately provided 12 months' notice of status termination.