



Department of Pharmacy

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Health Policy Commission
ATTN: Lois Johnson, General Counsel
50 Milk Street, 8th Floor
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To Whom It May Concern,

The Massachusetts General Hospital (MGH) Department of Pharmacy would like to submit written testimony and feedback regarding the practice of shifting drug distribution channels, commonly referred to as “white bagging” and “brown bagging” non-self-administered medications.

We would like to thank the Health Policy Commission for your commitment and collaboration pertaining to safely shifting drug distribution channels, and for the opportunity to provide feedback on this matter to ensure the safety of our patients as well as the ability to provide cost-effective healthcare to patients.

The MGH Department of Pharmacy does not support the practice of “brown-bagging” medications that require infusion. When patients bring in their own medication, there is no secure, informative, traceable chain of custody. Additionally, we cannot verify the handling of the medication prior to arrival at our pharmacy, and thus may provide suboptimal care to the patient if the drug has been adulterated or exposed to conditions outside of the recommended storage range.

The MGH Department of Pharmacy currently allows the practices of “white-bagging” with policies and procedures in place to ensure safe practice for receiving, tracking, compounding, and administering specialty medications. There are many insurers that require the practice of “white-bagging” in order for patients to receive their care at MGH rather than letting us “buy and bill” for the drug. If the practice of “white-bagging” were to be prohibited in the Commonwealth of Massachusetts, we would not be able to treat our patients with certain insurance plans that see their providers at MGH and would like to also receive their infusions at MGH.

Please contact us for further clarification or questions, if needed.

Sincerely,

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