COVID-19 PBM Concessions Chart Updates

Tracking Log of changes since original issuance (4/3/2020)

4/14/2020
1. **Medicare Part B** - CGS Memo further clarifying signature log requirements and clarified for Dates of Service during the Public Health Emergency
2. **MedImpact** – eliminated requirement for documenting full name and relationship of person picking up Rx

4/20/2020
1. **EnvisionRx** – audits canceled or postponed as of 3/16/2020

4/28/2020
1. **MeridianRx** – will not send audit requests for service dates of 3/15/2020 through the end of May. Patient signature requests with a DOS of 3/15/2020 or after, until the waiver is lifter, will be excluded.

4/30/2020
1. **Navitus** – has confirmed by email that they are extending waiver through the end of May and that no official communication has been issued as this is being evaluated on a monthly basis
2. **Express Scripts** – the temporary policy regarding collection of patient signatures has been extended until further notice

5/1/2020
1. **Humana** – Signature log and mailing waivers extended through May 2020. Non-FWA audits continue to be on hold and Humana will issue additional communications by May 31st.

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Proactive. Prepared. Protected
<table>
<thead>
<tr>
<th>PBM</th>
<th>Effective Date</th>
<th>Requirements</th>
<th>Mail Allowances</th>
<th>Audits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Caremark</td>
<td>03/18/2020</td>
<td>Delivery: Signature log with &quot;COVID&quot; + delivery date and time</td>
<td>Will allow mail from retail pharmacies</td>
<td>All onsite audits cancelled or postponed as of 3/18/2020 for audits requests will remain or hold audits</td>
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<td></td>
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<td>Mailing is allowed for pharmacies that have a previously established relationship with the member if agreed to/requested by member.</td>
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<td>in progress prior to COVID emergency. Initial results have been paused since early March, appeal reviews</td>
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<tr>
<td></td>
<td></td>
<td>Source: EnvisionRx memo 03/08/2020</td>
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<td>have also paused but decision letters will resume this week</td>
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<tr>
<td></td>
<td></td>
<td>Source: Humana memo 03/19/2020</td>
<td></td>
<td>No changes made to Special Investigations Unit (SIU) investigations</td>
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<td></td>
<td></td>
<td>Source: Express Scripts memo 04/03/2020</td>
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<td></td>
<td>Source: ProCare Rx memo 03/25/2020</td>
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<td></td>
<td></td>
<td>Source: PerformRx memo 03/23/2020</td>
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<td></td>
<td></td>
<td>Source: MedImpact memo 03/18/2020</td>
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<td></td>
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<td>Source: Navitus memo 04/18/2020</td>
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<td>Source: Humana memo 03/19/2020</td>
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<td>Source: Humana memo 03/21/2020</td>
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<td>Source: Medicare Part B (DMOBPOS) memo 04/03/2020</td>
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<td></td>
<td></td>
<td>Source: Medicare Part B (DMOBPOS) memo 04/03/2020 - UPDATE: Desk audits suspended as of 3/13/2020</td>
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<td>Source: OptumRx memo 03/19/2020</td>
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<td>Source: Prime Therapeutics memo 03/17/2020</td>
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<td>Source: ProCare Rx memo 03/25/2020</td>
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<td>Source: WellDyne memo 03/19/2020</td>
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</table>

**COVID-19 PBM Concessions**

**Proof of Delivery ("signature logs")**

- **Caremark**
  - Effective 03/01/2020, until further notice
  - Signature log with "COVID" + delivery date and time
  - Delivery: Signature log with "COVID Delivery" + delivery date and time (maintaining tracking information that links to Rx # and date of fill if using common courier)
  - Source: Caremark memo 03/08/2020

- **EnvisionRx**
  - Specific for Medicare Part D, unclear for other lines of business
  - Signature log with "COVID" or "C"
  - Delivery: Not otherwise specified
  - Source: EnvisionRx Quarterly Communication Q2 2020 04/24/20 & EnvisionRx memo 01/09/2020
  - Delivery: Documentation must contain member name, prescription number and date of service or delivery.
  - Source: EnvisionRx memo 03/08/2020

- **Express Scripts**
  - Effective 03/18/2020 - UPDATED: Desk audits suspended as of 3/13/2020
  - Source: WellDyne memo 03/19/2020

- **Humana**
  - Specific to Humana
  - Humana will waive any mail or home delivery restrictions for retail-only pharmacies for March-May 2020.
  - Effective 03/01/2020, until further notice

- **MedImpact**
  - Effective 03/18/2020
  - Delivery: proof of delivery via shipping or delivery service does not require a signature from the beneficiary or designee; however, some PBM benefit designs still require evidence of delivery
  - Source: MedImpact Pharmacy Newsletter 1st Quarter 2020 04/04/2020 (replaces the 03/20/2020 guidance)

- **MeridianRx**
  - Effective 03/01/2020
  - Delivery: Pharmacy staff to document "COVID-19" along with the date and time of pick-up
  - Delivery: If delivered by pharmacy staff, then document "COVID-19" and include delivery date, time and printed name or initials of delivery person. (If delivered by common carriers, then delivery confirmation will be accepted – carrier tracking number must link to prescription number and fill date and time)
  - Source: MeridianRx memo 04/04/2020

- **Navitus**
  - Effective 03/18/2020
  - Delivery: proof of delivery via shipping or delivery service does not require a signature from the pharmacy, but does require evidence of delivery
  - Source: Navitus memo 03/18/2020
  - Delivery: Proof of delivery via shipping or delivery service does not require a signature from the beneficiary or designee; however, some PBM benefit designs still require evidence of delivery
  - Source: Navitus memo 03/18/2020

- **OptumRx**
  - Effective 03/10/2020
  - Delivery: "Impacted by COVID-19" as well as a means to tie the signature log to the specific prescription (e.g. Rx # and fill date) is adequate
  - Source: OptumRx memo 03/10/2020

- **PerfecRx**
  - Effective 03/10/2020
  - Delivery: When a member picks up a medication, the point of sale transaction will be used in lieu of the signature.
  - Source: PerfecRx memo 03/10/2020

- **Prime Therapeutics**
  - Effective 03/18/2020
  - Delivery: "COVID-19" on the hardcopy or a date and time stamped notation in pharmacy's POS system
  - Source: Prime Therapeutics memo 03/17/2020

- **ProCare Rx**
  - Effective 03/18/2020
  - Delivery: Signature log with "COVID Delivery" + delivery date and time
  - Source: ProCare Rx memo 03/18/2020

- **SS&C Health**
  - Effective 03/13/2020
  - Delivery: The pharmacist or technician records "COVID-19" on the signature log when the prescription has been dispensed
  - Source: SS&C Health (DSN) memo 03/13/2020

- **WellDyne**
  - Effective 03/15/2020
  - Delivery: Signature log with "COVID Delivery" + delivery date and time
  - Source: WellDyne memo 03/15/2020

**Mail Allowances**

- Will allow mail from retail pharmacies

**Audits**

- All onsite audits cancelled or postponed as of 3/18/2020
- Desk audits suspended as of 3/13/2020
- Desk audits suspended as of 3/13/2020 (audit suspensions do not apply to FWA investigations or other exceptions that may be required by law)