



## PAAS National, Inc.

Expert Third-Party Contract and Audit Advice

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### 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 lifted, 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 31<sup>st</sup>.

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**COVID-19 PBM Concessions**

PBM	Proof of Delivery ("signature logs")	Mail Allowances	Audits
Caremark	Effective 03/01/2020, until further notice <b>In-store:</b> Signature log with "COVID" + delivery date and time <b>Delivery:</b> Signature log with "COVID Delivery" + delivery date and time (maintain tracking information that links to Rx # and date of fill if using common courier) Source: Caremark memo 03/20/2020	Will allow mail from retail pharmacies Source: Caremark memo 03/16/2020	
EnvisionRx	<b>Specific for Medicare Part D, unclear for other lines of business</b> <b>In-store:</b> Signature log with "COVID" or "C" <b>Delivery:</b> Not otherwise specified Sources: EnvisionRx Quarterly Communication Q1 2020 03/24/2020 & EnvisionRx memo 03/20/2020	Mailing is allowed for pharmacies that have a previously, established relationship with the member if agreed to/requested by member. Source: Email correspondence between EnvisionRx and PAAS 03/17/2020	All onsite audits cancelled or postponed as of 3/16/2020 Audit requests will remain on hold Audits in progress prior to COVID emergency: Initial results have been paused since early March, appeal reviews have also paused but decision letters will resume this week No changes made to Special Investigations Unit (SIU) investigations Source: ADDED EnvisionRx memo 04/15/2020
Express Scripts	Effective 03/18/2020 to <del>04/30/2020</del> UNTIL FURTHER NOTICE <b>In-store:</b> Acceptable documentation may take many forms (e.g. log book with Rx # and date of service, POS with Rx #, note on hardcopy, or an electronic annotation in your system). <b>Delivery:</b> Documentation must contain member name, prescription number and date of service or delivery. Source: <b>UPDATED</b> ESI memo 04/30/2020		Desk audits suspended as of 3/23/2020 Field audits suspended as of 3/13/2020 (audit suspensions do not apply to FWA investigations or other exceptions that may be required by law) Source: ESI memo 03/23/2020
Humana	<b>In-store:</b> Humana will accept Point-of-sale documentation showing the date and time Rx was sent out for delivery for claims in March-April and May 2020 in lieu of a patient signature <b>Delivery:</b> Not otherwise specified Source: <b>UPDATED</b> Humana memos 03/21/2020 , 05/01/2020	Humana will waive any mail or home delivery restrictions for retail-only pharmacies for March-May 2020. Source: <b>UPDATED</b> Humana memo 03/21/2020 , 05/01/2020	Humana will not initiate new desk/onsite audits and will suspend all in-progress desk/onsite audits (except for audits requested by CMS or initiated due to FWA concerns). <b>By May 31, 2020 Humana will communicate the need for further extension.</b> Source: <b>UPDATED</b> Humana memos 03/21/2020, 05/01/2020
Medicare Part B (DMEPoS)	<b>In-store:</b> During the Public Health Emergency, document "COVID-19" signature unavailable and the appropriate date of delivery <b>Delivery:</b> Proof of delivery via shipping or delivery service does not require a signature from the beneficiary or designee; however it does require evidence of delivery Source: <b>UPDATED</b> CGS memo 04/14/2020 (replaces the 2019-Novel Coronavirus (COVID-19) Provider Burden Relief FAQs March 2020 guidance)		CMS has suspended most Medicare Fee-For-Service (FFS) medical review. This includes pre- and post-payment medical reviews conducted by MACs, TPE reviews, SMRC, and RAC reviews. Targeted Probe and Educate reviews that are in process will be suspended and claims will be released and paid. Current post-payment MAC, SMRC, and RAC reviews will be suspended and released from review. However, CMS may conduct medical reviews during or after the PHE if there is an indication of potential fraud. Source: 2019-Novel Coronavirus (COVID-19) Provider Burden Relief FAQs March 2020
MedImpact	Effective 03/01/2020 <b>In-store:</b> Pharmacy staff to document "COVID" along with the date and time of pick-up <b>Delivery:</b> (a) If delivered by pharmacy staff, then document "COVID" and include delivery date, time and printed name or initials of delivery person, (b) If delivered by common carriers, then delivery confirmation will be accepted – carrier tracking number must link to prescription number and fill date Source: <b>UPDATED</b> MedImpact Pharmacy Newsletter 1st Quarter 2020 04/14/2020 (replaces the 03/20/2020 guidance)	MedImpact allows local delivery (within 50 miles) by courier, mail or other common carrier Source: MedImpact memo 03/18/2020	Onsite Audits cancelled through 04/30/2020, however Desk audits will continue, and pharmacies should work with auditor if difficulty responding due to the emergency Source: MedImpact memo 03/18/2020
MeridianRx	<b>In-store:</b> Pharmacies are not expected to gather patient signatures during this time due to no-contact delivery methods <b>Delivery:</b> Not otherwise specified Source: <b>ADDED</b> MeridianRx memo April 2020		MeridianRx will not send audit requests for services of March 15, 2020 through the end of May. Patient signatures are not required for claims on or after 03/15/2020 until the waiver is lifted. Source: <b>ADDED</b> MeridianRx memo April 2020
Navitus	<del>Valid through end of April 2020</del> Extending on a month by month basis <b>In-store:</b> Pharmacy staff should capture the date and time of pick-up and write "COVID-19" and pharmacy staff initials <b>Delivery:</b> Notate delivery with date and time (if using courier such as FedEx, UPS or USPS), the electronic tracking and delivery time stamp will suffice) Source: <b>UPDATED</b> Navitus memo 03/20/2020, unofficial email from Navitus 04/30/2020	<del>Valid through end of April 2020</del> Extending on a month by month basis Waiving restrictions of mail/home delivery, must be licensed where Rx is shipped Source: <b>UPDATED</b> Navitus memo 03/20/2020, unofficial email from Navitus 04/30/2020	Onsite audits have been suspended. However, desktop audits will proceed. Source: Unofficial email from industry source 04/02/2020
OptumRx	Effective 03/01/2020 <b>In-store:</b> "Impacted by COVID-19" and pharmacy staff initials <b>Delivery:</b> "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 03/20/2020	Effective 03/10/2020 Retail pharmacies can mail via common carrier (USPS, UPS FedEx or local carrier) Source: OptumRx memo 03/20/2020	Onsite and desk audits have been suspended (except FWA investigations) Source: Unofficial email from industry source 03/30/2020
PerformRx	<b>In-store:</b> When a member picks up a medication, the point of sale transaction will be used in lieu of the signature. <b>Delivery:</b> No differentiation specified Source: PerformRx memo 03/23/2020		
Prime Therapeutics	<b>In-store:</b> "COVID-19" on the hardcopy or a date and time stamped notation in pharmacy's POS system <b>Delivery:</b> Electronic delivery records should include the patient name, address, prescription order number, fill date, name of person receiving medication, and the date and time of delivery. Source: Prime Therapeutics memo 03/27/2020	Pharmacies can mail medications if they are licensed in the states that they are mailing or delivering to. Prime requires tracking of the prescription. Source: Prime Therapeutics memo 03/27/2020	Onsite audits cancelled as of 03/16/2020 Daily and historical desktop claim audits are suspended as of 03/24/2020 (other than FWA investigations and essential audits that may be required by federal or state law) Source: Prime Therapeutics memo 03/27/2020
ProCare Rx	<b>In-store:</b> Signature log with "COVID" + delivery date and time <b>Delivery:</b> Signature log with "COVID Delivery" + delivery date and time Source: ProCare Rx memo 03/25/2020		Temporarily postpone all pharmacy audits, including those that were recently notified or that were to be notified in the next days. Source: ProCare Rx memo 03/25/2020
SS&C Health aka DST Pharmacy Solutions	Effective 03/23/2020 <b>In-store:</b> The pharmacist or technician records "COVID-19" on the signature log when the prescription has been dispensed <b>Delivery:</b> A date and time stamp of delivery is added to the prescription record Source: SS&C Health (DST) memo 03/26/2020		
WellDyne	<b>In-store:</b> If a patient is unable to acknowledge receipt of delivery, the pharmacy must indicate the reason on the hardcopy or within dispensing software <b>Delivery:</b> Not otherwise specified Source: WellDyne memo 03/19/2020		No new notification letters regarding desktop audits have been sent as of Monday, March, 23, 2020. However, any open audits must be responded to and closed out. Source: Unofficial email from industry source 04/02/2020

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