



PAAS National, Inc.

Expert Third-Party Contract and Audit Advice

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URGENT MEMBER ALERT:

COVID-19 Audit Considerations

We are sending heartfelt gratitude to all the pharmacies and employees on the front lines during this pandemic. We are accustomed to hearing how great independent pharmacies are – always going above and beyond for their patients (and communities), and that sentiment has only been amplified while our Nation is in crisis. PAAS National® is proud to support you during these trying times and we want to thank you for your endurance, perseverance, and service to our communities.

National Community Pharmacists Association (NCPA) has been remarkably quick to act on COVID-19. Not only have they developed an extensive website [resource](#) for pharmacists, but they have also had countless advocacy [efforts](#) to support the work you are doing – with requests for things like a reprieve on DIR fees, compounding waivers, and easing of PBM documentation requirements (e.g. signature waivers and removing delivery/mail restrictions). Combine that with their weekend and after-hours conference calls, it is nothing short of phenomenal. We applaud their efforts and collaboration with PAAS in this time of need.

This pandemic is unlike anything community pharmacy has ever seen, but we are up for the challenge. We admire your efforts to find creative ways to continue to serve patients (plastic shower curtains, acrylic guards, or curbside pick-up – we love the ingenuity). While in this crisis, PAAS wants you to stay informed of PBM requirements to help keep your staff, patients, and business safe.

Since mid-March, many pharmacies have asked about a reduction, or outright waiver, of PBM requirements, most notably: proof of delivery, mailing/delivery restrictions, PBM overrides, ongoing audits, and State of Emergency/Executive Orders. This situation is extremely fluid, with changing dynamics and daily updates from PBMs. This is what we know as of today (April 3rd, 2020):

1. Proof of Delivery Requirements (“signature logs”)

Caremark, Express Scripts, OptumRx, and Prime Therapeutics are giving a waiver on requiring the collection of patient signatures during the pandemic. If you have an electronic signature capture device that contains the Rx Number(s) and a date/time stamp, you should be documenting the following on the patient signature line at the point of sale:

“COVID-19” along with the respective employee’s initials

Note the following exceptions:

- a. Where signatures are required by law, there are NO waivers.
- b. For pharmacies with paper logs, Prime Therapeutics (and originally Express Scripts) specifies that if it is not an “electronic annotation tied to the prescription with a date and time stamp from the system” then it must be documented on the prescription hard copy. Yes – PAAS realizes the absurdity.



- c. Humana and PerformRx will be looking for a detailed Point of Sale transaction receipt for Proof of Delivery in lieu of a patient signature.
- d. MedImpact is requiring the full name of the person picking up AND relationship (if not the beneficiary) in addition to the “COVID-19”.
- e. NO waivers on copay collection.

The inconsistency between PBMs makes it extremely challenging to develop internal procedures that are easy for staff to adhere to. PAAS has developed a chart of the information we know, and the source document used. We intend to update it on a regular basis, as information comes in – to the best of our abilities. Pharmacies need to stay vigilant as we get on the other side we anticipate no leniency when these waivers are removed.

See our chart [here](#). Save the link and be sure to revisit. If you see conflicting information with a PBM communication, fax us the information (608-873-4009) and we will review/update the chart.

2. Mail/Delivery Restrictions

Humana, Navitus, and OptumRx have temporarily lifted their restrictions for mailing/delivery during the national state of emergency, but pharmacies need to ensure they are licensed where the prescriptions are being shipped to. See additional information on the [chart](#).

3. PBM Overrides

Many PBMs have lifted the refill too soon rejections, while others are allowing the pharmacy to use Submission Clarification Codes (primarily SCC 13). Still further, there are others that have initially required the pharmacy to call the help desk. To help avoid potential audit situations, either pull the original hardcopy, or make a clear, electronic annotation (preferably with an electronic date/time stamp) with the following:

1. SCC used
2. Reason for use
3. Date
4. Pharmacy Staff Initials

4. Audit Postponements/Suspensions

Express Scripts, Humana, OptumRx, and Prime Therapeutics have suspended all onsite and desk audits. MedImpact has only suspended onsite audits at this time. CMS has also suspended most Medicare Fee-For-Service medical reviews, including MACs, SMRC, RAC, and TPEs. If you have an audit in progress or scheduled, PAAS recommends reaching out to the auditor to have a discussion and/or confirm their cancellation. We have seen audit contractors “not get the memo”, so be sure to follow-up on the PBM communication. See our [chart](#) for the most up to date information available.

Typically, the suspension does not apply to investigational audits with suspected FWA; or those required by state or federal law.



5. State of Emergency/Executive Orders

Many states have declared a state of emergency in response to the pandemic. Pharmacies can check the NABP website for Coronavirus Updates [here](#). They also recommend pharmacists go to the COVID-19 [resource center](#) created by APhA which contains helpful information regarding COVID-19.

Many governors have issued orders to allow pharmacists to provide an emergency refill(s) on non-controlled maintenance medications. Pharmacists should first make a good faith effort to obtain refill authorizations from prescribers. If there is no response to the refill request after reasonable effort, PAAS would recommend the following for audit purposes:

1. Print/Save any Executive Orders your state may have issued
2. Be aware of the effective/end dates on these emergency refill authorizations
3. Document dates and attempts to obtain the refill authorization from the prescriber
4. Create a prescription with all the appropriate elements and a statement (e.g. *"Per State of Emergency Protocol"*)
5. Provide the emergency supply
6. Contact the prescriber, when able, to alert them an emergency supply was given
7. Be sure to adhere to your individual state order requirements

PAAS thanks you for all your efforts!

Not a member?

Consider joining at www.PAASNational.com or give us a call at 608-873-1342. We've been helping community pharmacies stay at the forefront of PBM audit tactics since 1993. We offer proactive guidance with urgent email alerts and our monthly Third-Party Newslines. Our dedicated audit analysts guide our members through audits from start to finish. Having analyzed over 80,000 audits, we've saved members over \$600 million in audit recoupments.