



PAAS National, Inc.

Expert Third-Party Contract and Audit Advice

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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 In-store: Signature log with "COVID" + delivery date and time Delivery: Signature log with "COVID Delivery" + delivery date and time (maintain tracking information that links to Rx # and date of fill if using common courier) <i>Source: Caremark memo 03/20/2020</i>	Will allow mail from retail pharmacies <i>Source: Caremark memo 03/16/2020</i>	
EnvisionRx	Specific for Medicare Part D, unclear for other lines of business In-store: Signature log with "COVID" or "C" Delivery: Not otherwise specified <i>Sources: EnvisionRx Quarterly Communication Q1 2020 03/24/2020 & EnvisionRx memo 03/20/2020</i>	Mailing is allowed for pharmacies that have a previously, established relationship with the member if agreed to/requested by member. <i>Source: Email correspondence between EnvisionRx and PAAS 03/17/2020</i>	
Express Scripts	Effective 03/18/2020 to 04/30/2020 In-store: 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). Delivery: Documentation must contain member name, prescription number and date of service or delivery. <i>Source: ESI memos 03/20/2020 and 03/19/2020</i>		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) <i>Source: ESI memo 03/23/2020</i>
Humana	In-store: Humana will accept Point-of-sale documentation showing the date and time Rx ws sent out for delivery for claims in March-April 2020 in lieu of a patient signature Delivery: Not otherwise specified <i>Source: Humana memo 03/21/2020</i>	Humana will waive any mail or home delivery restrictions for retail-only pharmacies for March-April 2020. <i>Source: Humana memo 03/21/2020</i>	Humana will not initiate new desk/onsite audits and will suspend all in-progress desk/onsite audits until April 30, 2020 (except for audits requested by CMS or initiated due to FWA concerns). <i>Source: Humana memo 03/21/2020</i>
Medicare Part B (DMEPOS)	Suppliers should document in the medical record the appropriate date of delivery and that a signature was not able to be obtained because of COVID-19. <i>Source: 2019-Novel Coronavirus (COVID-19) Provider Burden Relief FAQs March 2020</i>		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 postpayment 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. <i>Source: 2019-Novel Coronavirus (COVID-19) Provider Burden Relief FAQs March 2020</i>
MedImpact	Effective 03/13/2020 In-store: Signature log with "COVID-19" along with the date, time, and full name of person picking up AND relationship (if not beneficiary) Delivery: "Best practice" is to include a delivery confirmation card and instruct patient to sign, date and mail document to pharmacy or return it at a later date. Alternatives include (a) document "COVID-19" and include delivery date and time, AND full printed name of delivery person or (b) Copies of carrier delivery confirmations that link between the Rx # and fill date with the carrier's tracking number. <i>Source: MedImpact memo 03/20/2020</i>	MedImpact allows local delivery (within 50 miles) by courier, mail or other common carrier <i>Source: MedImpact memo 03/18/2020</i>	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 <i>Source: MedImpact memo 03/18/2020</i>
Navitus	Valid through end of April 2020 In-store: Pharmacy staff should capture the date and time of pick-up and write "COVID-19" and pharmacy staff initials Delivery: Notate delivery with date and time (if using courier such as FedEx, UPS or USPS, the electronic tracking and delivery time stamp will suffice) <i>Source: Navitus memo 03/20/2020</i>	Valid through end of April 2020 Waiving restrictions of mail/home delivery, must be licensed where Rx is shipped <i>Source: Navitus memo 03/20/2020</i>	Onsite audits have been suspended. However, desktop audits will proceed. <i>Source: Unofficial email from industry source 04/02/2020</i>
OptumRx	Effective 03/01/2020 In-store: "Impacted by COVID-19" and pharmacy staff initials 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 <i>Source: OptumRx memo 03/20/2020</i>	Effective 03/10/2020 Retail pharmacies can mail via common carrier (USPS, UPS FedEx or local carrier) <i>Source: OptumRx memo 03/20/2020</i>	Onsite and desk audits have been suspended (except FWA investigations) <i>Source: Unofficial email from industry source 03/30/2020</i>
PerformRx	In-store: When a member picks up a medication, the point of sale transaction will be used in lieu of the signature. Delivery: No differentiation specified <i>Source: PerformRx memo 03/23/2020</i>		
Prime Therapeutics	In-store: "COVID-19" on the hardcopy or a date and time stamped notation in pharmacy's POS system Delivery: 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. <i>Source: Prime Therapeutics memo 03/27/2020</i>	Pharmacies can mail medications if they are licensed in the states that they are mailing or delivering to. Prime requires tracking of the prescription. <i>Source: Prime Therapeutics memo 03/27/2020</i>	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) <i>Source: Prime Therapeutics memo 03/27/2020</i>
ProCare Rx	In-store: Signature log with "COVID" + delivery date and time Delivery: Signature log with "COVID Delivery" + delivery date and time <i>Source: ProCare Rx memo 03/25/2020</i>		Temporarily postpone all pharmacy audits, including those that were recently notified or that were to be notified in the next days. <i>Source: ProCare Rx memo 03/25/2020</i>
SS&C Health aka DST Pharmacy Solutions	Effective 03/23/2020 In-store: The pharmacist or technician records "COVID-19" on the signature log when the prescription has been dispensed Delivery: A date and time stamp of delivery is added to the prescription record <i>Source: SS&C Health (DST) memo 03/26/2020</i>		
WellDyne	In-store: If a patient is unable to acknowledge receipt of delivery, the pharmacy must indicate the reason on the hardcopy or within dispensing software Delivery: Not otherwise specified <i>Source: WellDyne memo 03/19/2020</i>		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. <i>Source: Unofficial email from industry source 04/02/2020</i>

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