

Prime Audit Advisor

COVID-19 Pharmacy

Across the nation, we are challenged by the COVID-19 pandemic. Within the pharmacy industry, this includes potential drug shortages, finding new ways to deliver necessary medications to patients while observing social distancing, and increased prescription orders from expanded telemedicine services.

As previously communicated, to support our pharmacy partners, Prime Therapeutics has suspended pharmacy audits other than those due to fraud, waste and abuse or as required by state and federal regulations. Future retrospective pharmacy audits will consider a notation of "COVID-19", or similar reference to the current pandemic, in lieu of a patient delivery signature.

Many of our benefit sponsors have also taken actions in response to COVID-19, such as, eliminating member cost share for COVID-19 treatment and allowing early refills of medication consistent with the government guidance.

Certain state and federal regulatory agencies have made temporary adjustments including but not limited to allowing pharmacies to refill medications, relaxing controlled substance requirements, and modifying out of state licensing requirements.

When dispensing medications during COVID-19, pharmacies are responsible to follow state and federal regulations, including emergency orders. Once pharmacy audits are reinstated, auditors will consider the additional drug quantities noted in emergency orders and declarations compared to the number of days supply of medication billed, along with other regulations and adjustments put in place during the applicable emergency period.

Regardless of whether a COVID-related regulation is in place, pharmacies are required to maintain documentation to support appropriate dispensing of medications. Retrospectively, auditors may request the pharmacy to provide date and time stamped documentation regarding the reason refills were provided in excess of applicable regulations, or of a 90-day supply, as applicable.

Medicare Part D allows a 90-day supply of maintenance medication during the emergency period. If you need refill processing assistance, please contact Prime's Pharmacy help desk at 1-800-821-4795.

This information is intended to educate Participating Pharmacies on Prime's billing requirements.

For additional information please visit Prime's website [PrimeTherapeutics.com](https://www.primetherapeutics.com) and navigate to: Resources > Pharmacy + provider > Pharmacy providers > Provider manual

Thank you,

Your Pharmacy Audit & FWA team

If you have any questions, please contact the Pharmacy Audit department at pharmacyaudit@primetherapeutics.com.