

COMPLIANCE VERIFICATION BENEFACT

A BULLETIN FOR PHARMACY SERVICE PROVIDERS FROM ALBERTA BLUE CROSS®

Number 11 • May 2024

Alberta Blue Cross Pharmaceutical Services Provider Agreement compliance verification review update

At Alberta Blue Cross, we are committed to safeguarding the value and sustainability of the benefit plans and programs we are entrusted to administer. To ensure plan sponsor payment of eligible claims is done appropriately, we employ strategies to protect the integrity of our customers' benefit plans.

Claiming of additional dispensing fees

The completion of compliance verification reviews determined some pharmacy providers' documentation did not meet the requirements to support the claims for additional dispensing fees which resulted in the financial recovery of monies paid for those claims. As part of our process, we have returned the monies directly back to the plan sponsor in fulfillment of our obligation to ensure the sustainability of their benefit plans.

Quantitative limits

We would like to remind all pharmacy providers to be aware of the Frequent Dispensing Policy (FDP) in Appendix C of the Alberta Blue Cross Pharmaceutical Services Provider Agreement (ABCPSPA).

Quantitative limits are applicable to all plans under Alberta Blue Cross. It is expected that 90 to 100 days' supply will be dispensed for drug products that are used on a chronic or long-term basis by plan members.

In cases where drug products must be dispensed more frequently, supplementary prescription documentation must be retained to support the claims for additional dispensing fees (e.g., 28 to 89 days' supply or 1 to 27 days' supply). This documentation must be completed prior to the initiation of frequent dispensing and retained by the pharmacy and is valid for one year. The document must be kept for a minimum of two years even when a new one is obtained. Documentation must be completed each year in cases where the requirement for frequent dispensing extends beyond one year.

DISPENSING ONE TO 27 DAYS' SUPPLY

If a plan member requires dispensing of a drug product with a 1 to 27 days' supply, the FDP applies.

Pharmacies must document the following at the time of the claim:

- the plan member's identification information including name, PHN and date of birth;
- who initiated the request and the date of the request;
- the name of each drug product;
- the timeframe for frequent dispensing and the required frequency;
- the rationale for frequent dispensing* (acceptable criteria are outlined in the FDP); and
- the rationale for why less frequent dispensing is not appropriate.

*Note: the Special Services Code corresponding to the eligibility criteria is not considered documentation of the rationale, but a data element of the claim.

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Please refer to the *Alberta Blue Cross pharmaceutical services reference guide for Alberta pharmacies* available at ab.bluecross.ca/pdfs/82477-ab-pharmacy-reference-guide.pdf for requirements of documentation.

DISPENSING 28 TO 89 DAYS' SUPPLY

If a plan member requires dispensing of a drug product used on a chronic or long-term basis with a days' supply between 28 to 89 days, pharmacies must document the following information at the time of the claim:

- the plan member's request for frequent dispensing; OR
- the health care provider's request for frequent dispensing for one of the following reasons:
 - increased compliance,
 - abuse control,
 - determination of therapeutic effectiveness, or
 - potential drug sensitivities.

The rationale to support dispensing for a 28 to 89 day period must also be documented (electronic or written).

COMMON AREAS OF NON-COMPLIANCE

- missing the time frame for frequent dispensing and the required frequency;
- missing the list of drug products that are to be frequently dispensed;
- blister pack patients do not have frequent dispensing documentation;
- missing authorization—the pharmacy does not have authorization at the time of the claim, it is obtained after dispensing or in response to a CVR;
- submitting claims with a 1 to 27 days' supply at the plan member's request;
- blanket letters from any source (such as care facilities, prescribers, etc.) which are not specific to a plan member, do not provide a time frame for frequent dispensing, and do not outline the drug products to be dispensed frequently;
- using notations on prescriptions such as "bubble pack," "dosette," etc. as valid authorization;
- backdating or creating documentation after receiving a request for documentation;
- using a previous prescription to authorize frequent dispensing on subsequent prescriptions (unless the documentation on the previous prescription meets the requirements of the FDP and is retained and provided on request); and
- not retaining previous documentation for two years when new documentation is obtained.

More information can be found in the *Alberta Blue Cross pharmaceutical services reference guide for Alberta pharmacies* available at ab.bluecross.ca/pdfs/82477-ab-pharmacy-reference-guide.pdf.

FDP frequently asked questions are available at ab.bluecross.ca/pdfs/pharmacy-benefacts/Frequent-Dispensing-Policy-Q&As.pdf.

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How you can help

If you suspect any suspicious or inappropriate claiming activity from plan members or providers, please report it immediately by calling 1-866-441-8477 or through Alberta Blue Cross's website at albertabluecross.confidenceline.net.

All information will be kept strictly confidential. Suspicious activity may also be reported anonymously to Claims Audit and Investigation Services, Alberta Blue Cross, 10009-108 Street NW Edmonton, AB T5J 3C5.

For assistance with benefit or claim inquiries, please contact an Alberta Blue Cross Pharmacy Services Provider Relations contact centre representative at

780-498-8370 (Edmonton and area)

403-294-4041 (Calgary and area)

1-800-361-9632 (toll free)

FAX 780-498-8406 (Edmonton and area)

FAX 1-877-305-9911 (toll free)

Alberta Blue Cross offers online access to current Pharmacy Benefacts and supplemental claiming information to assist with the submission of your direct bill drug claims.

Visit ab.bluecross.ca/providers/pharmacy-home.php

