

MEMO

To: Network Pharmacy
From: Elixir Pharmacy Audit and FWA Team
Date: Wednesday, July 15th, 2020



The Pharmacy Audit Whisperer – Maintaining Rx Compliance during a Pandemic, continued

Following the development of state reopening efforts we have resumed routine pharmacy audit activities. Thank you for your continued support of our members during these unprecedented times.

The purpose of this communication is to share:

- Specific actions regarding routine pharmacy audits;
- Implementation of virtual audits;
- Signature log expectations.

Actions taken regarding routine pharmacy audits:

- Pharmacy audits have resumed, and initial findings letters started being shared with pharmacies
- Audit request letters resumed on June 10, 2020 as permitted by state regulation or guidance

If you have any questions regarding the status of your audit or need to request an extension, please reach out to PharmacyAudits@elixirsolutions.com.

Implementation of virtual audits:

Starting in August and until further notice, onsite audits will be conducted virtually. In lieu of a physical visit by an auditor, virtual audits will include:

- Prescription records request (copy of prescriptions, signature log, etc.)
- Request for various compliance-related documents such as copies of licenses, pictures of certain areas of the pharmacy, etc.;
- An audit interview by telephone. The interview is expected to take approximately 30 minutes.

Pharmacies will receive communication from auditor describing the process and to schedule telephonic interview.

Signature log expectations

No changes have been made to signature log expectations since our last communication, dated March 20th 2020. Based on directives issued by CMS, if a signature cannot be obtained, pharmacies should document "COVID" or "C" as the signature, including controlled substances. Please continue to use your professional judgment and follow applicable federal, state, and local law before delivering or dispensing any medication. Also, at this time, this guidance applies to Medicare Part D only. Your state may still require a signature before dispensing controlled substances for non-Medicare plans.

Requirements for prescriptions delivered by common carrier have not changed, and remain as described in the Pharmacy Manual.

If you have any questions regarding this communication, please contact PharmacyAudits@elixirsolutions.com.

Thank you,
Elixir