

November 6, 2020

COM-2020-092

PharmPix Audit Reports

Educational bulletin of the Pharmacy Audit process

Dear Pharmacy Provider:

Best regards from PharmPix. As part of PharmPix's commitment to offering excellent service and keeping the provider informed, we will be sending educational communications related to the pharmacy audit process. In this communication, we will focus on what is a pharmacy audit, its objective, and the audit types.

The audit process is one of the mechanisms used in evaluating the pharmacy procedures, which allows the PBM or client to ensure that the provider is complying with the contractual agreements and the applicable regulatory requirements.

Pharmacy audits address four particular aspects:

- 1) detection of fraud, abuse, and waste;
- 2) validation of data and documentation sent during the billing process;
- 3) proof of compliance with applicable laws and regulations
- 4) ensure the quality of the services offered to the insured.

There are four types of audits to which a pharmacy may be exposed:

1) **Concurrent Audit** generally occurs in real-time when claims submitted by the pharmacy contain amounts that differ significantly from the norm or when there are excessive charges. Usually, the pharmacy is notified as soon as the

claim is submitted, to be corrected before the patient receives their prescription.

2) **The Retrospective Audit:**

a) **Desk Audit** (Desktop) - In this type of audit, the pharmacy is notified by fax, certified mail, or email. Commonly, the auditor could request a copy of the prescriptions, signature logs, supplier invoices, among other documents. The information must be provided (by fax, email, or mail) before the date stipulated in the notification. The auditor doesn't visit the pharmacy to perform this type of audit.

b) **On-site Audit-** (Onsite) - The pharmacy is notified for an on-site audit via certified mail, fax, or email. The notification could include the period to be audited and a list of the documents that will be evaluated. The pharmacy must have a place and a member of the pharmacy staff available to assist the auditor during the audit. Upon completing the audit, the auditor will summarize the findings to the person who assisted through the process.

c) **Investigative Audit** – This type of audit tends to be more comprehensive than on-site audits as they arise when there is evidence (based on a preliminary evaluation) of possible



fraud, abuse, or waste caused by a provider or patient. This audit could integrate regulatory and/or law enforcement agencies

3) **The Compliance Audit** is focused on validating the pharmacy's compliance with applicable laws and regulations. This audit may include the review of Policies and Procedures, monthly verification of Exclusions of the OIG, validity of licenses and permits of the pharmacy, and validation of compliance with the requirements of the contractual terms with the PBM, among other.

4) **The Quality Audit** is focused on validating the quality and safety measures that the pharmacy uses in the dispensing process and the services provided to the population. This audit generally occurs concurrently with the Compliance audit. It may include the review of the Business Continuity Plan, Dispensing Error Management Program, Facilities, Organization, and Clinical Programs (such as MTM, Health Clinics, and Adherence Programs, among others), among other aspects.

In the next communication, we will be providing information on the documentation that is verified depending on the audit type. If you have any questions or want more information about this communication, you can contact us at 787-522-5252, Extension 217, via email at auditunit@pharmpix.com or visit our website: www.pharmpix.com; in the Provider area search under Resources, you can find the Pharmacy Provider Manual.

Once again, thanks for your attention and commitment.

Cordially,

FWA & Pharmacy Audit Unit

