



Important DMEPOS Update

The Tennessee Pharmacists Association reminds pharmacies about Durable Medical Equipment, Prosthetics, Orthotics, and Supplies (DMEPOS) accreditation. After September 30, 2009, the Centers for Medicare and Medicaid Services (CMS) will require all suppliers furnishing any of the following items or services for CMS patients to be accredited. The covered items are:

- DME
- Medical supplies
- Home Dialysis supplies and equipment
- Therapeutic shoes
- Parenteral shoes and enteral nutrient, equipment and supplies
- Transfusion medicine
- Prosthetic devices, prosthetics and orthotics.

THIS DOES INCLUDE DIABETIC TESTING SUPPLIES!

Pharmacists and pharmacies are not exempt from this accreditation. Although efforts continue in pursuit of an exemption for pharmacists and pharmacies, the outcome of these efforts does NOT appear favorable before the January 31, 2009, application deadline. Therefore, pharmacies should continue to pursue accreditation, if this fits the pharmacy's business model.

The pharmacy decision-maker should also be aware that CMS announced in a final rule on December 29, 2008, that it will require certain durable medical equipment suppliers, including pharmacists, to post a \$50,000 surety bond, costing approximately \$1,500 annually. Existing suppliers must comply with this requirement by October 2, 2009, while newly enrolling suppliers must meet this requirement by May 4, 2009.

After making the business decision to continue to provide covered items, the pharmacy should apply to an accreditation organization. To continue billing Medicare for covered items after September 30, 2009, the pharmacy must submit a complete application by January 31, 2009, to one of the Deemed Accreditation organizations for suppliers of durable medical equipment, prosthetics, orthotics and supplies.

If the pharmacy was accredited by these or other organizations prior to January 1, 2007, the pharmacy will need to contact that organization to update for DMEPOS accreditation. To determine the deadlines for updating, pharmacies are advised to contact their accreditation organizations as soon as possible. Accreditation that was granted prior to January 1, 2007, did not include DMEPOS standards and therefore will not apply to the upcoming deadlines.

The organizations listed on the following page will credit DMEPOS suppliers.

Important Pharmacy Audit Information

As reported to members on January 9, TPA has been made aware that SXC, the pharmacy benefits manager (PBM) for TennCare, has contracted with Prudent Rx, a company that performs pharmacy prescription audits, to audit TennCare prescriptions on behalf of SXC. TPA has learned from members that Prudent Rx has begun conducting audits in Tennessee on behalf of SXC.

Generally, items that are at high risk for audit include ophthalmic products, otic products, diabetic supplies, syringes, insulin, creams, ointments, inhalers, and quantities dispensed that exceed usual dosing. TPA reminds pharmacists of the following recommendations:

- PBMs do not recognize "Use as directed" as appropriate directions for determining days supply. The pharmacy should contact the prescriber to determine appropriate directions and the appropriate days supply based on these directions. For instance, with a Humulin NPH prescription written with directions "use as directed," the pharmacist cannot determine appropriate days supply. The pharmacy should contact the prescriber and clarify the directions. These clarified directions should be documented on the prescription, with the date and individuals involved in the clarification noted.
- Correct identification of the prescriber is important. For instance, if an APRN writes a prescription and the pharmacy uses the APRN's supervising prescriber to bill the prescription, the claim could be reversed on audit.
- Do NOT use refills to increase the quantity to dispense without prescriber consultation and documentation.
- Do NOT provide quantities which exceed the allowance of the plan by allowing ambiguous directions for use.
- Do NOT use an erroneous days supply or use the plan allowance without calculation of the directions for use.
- Do NOT use an erroneous DEA/NPI on any prescription transmission.
- Do NOT use your pharmacy's NPI/DEA number on transmission of a controlled substance claim.
- The pharmacy should always be able to produce an original hard copy prescription for each prescription dispensed. Originals should follow the rules for "Tamper Resistant" prescriptions. To access the exact requirements for these prescriptions go to: www.tnpharm.org/MembersOnly/TennCare/email.9.4.08tamper.pdf.
- The signature log should be maintained in a retrievable manner. The practice of allowing a patient to sign verification of receipt on one prescription to represent the receipt of multiple prescriptions has been questioned by some PBMs. A practice to follow for the receipt of multiple prescriptions may be for the patient to sign one receipt and initial the others. This practice will keep the PBM from claiming that the acknowledgement applies to only one prescription and not all prescriptions picked up.

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PROVIDING INDEPENDENT PHARMACY WITH THE TOOLS TO STAY COMPETITIVE



Important DMEPOS Update (continued from page 1)

The following organizations will accredit DMEPOS suppliers:

JCAHO

601 13th Street, NW
Suite 1150N
Washington, D.C. 20005
www.jointcommission.org/

Approved for Categories: All products and services described in Section 1834(a) (13) of the Act, prosthetic devices, orthotics and prosthetics described in Section 1834(h) of the Act; and items described in Section 1842(s) (2) of the Act.

National Association of Boards of Pharmacy

6701 Democracy Boulevard, Suite 300
Bethesda, MD 20817
www.nabp.net

Approved for Categories: DME Diabetic Products and Supplies, Enteral and Parenteral Nutrients and Supplies, off the shelf products and supplies – Respiratory, Urological, Mobility Aids, Wound Care, and Medical Non Custom Orthotics and Prosthetics

Board of Orthotist/Prosthetist Certification

7150 Columbia Gateway Dr., Suite G
Columbia, MD 21045
www.bocusa.org

Approved for Categories: All orthotics, prosthetics, pedorthics; DME, All Respiratory and POV

The Compliance Team, Inc.

P.O.Box 160
905 Sheble Lane, Suite 102
Spring House, PA 19477
www.exemplaryprovider.com

Approved for Categories: All mail order and home delivery durable medical equipment, prosthetics, orthotics, and supplies; Home dialysis supplies; therapeutic shoes and inserts

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tpa@tnpharm.org
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American Board for Certification in Orthotics & Prosthetics, Inc.

330 John Carlyle Street, #210
Alexandra, VA 22314
www.abcop.org

Approved for Categories: Comprehensive orthotics, comprehensive prosthetics, prefabricated custom fitted orthotics, post mastectomy prosthetics, non-custom therapeutic shoes, comprehensive therapeutic shoes, ocular prosthetics, facial prosthetics, somatic prosthetics, Ancillary assistive ambulatory devices (canes, walkers, crutches) for those suppliers who qualify for O&P accreditation

The National Board of Accreditation for Orthotic Suppliers

1337 Howe Ave., Suite 230
Sacramento, CA 95825
www.nbaos.org

Approved for Categories:
Orthotics – custom fabricated;
Orthotics – non-customized;
Orthotics – custom; Custom and non-customized prosthetics

Commission on Accreditation of Rehabilitation Facilities

4891 E. Grant Road
Tucson, AZ 85712
www.carf.org

Approved for Categories: Wheelchairs, Prosthetic Devices (including those devices (other than dental) that replace all or part of an internal body organ; Orthotics and prosthetics, including leg, arm, back, and neck braces, artificial legs, arms and eyes, and extra depth shoes with inserts or custom molded soles with inserts; therapeutic shoes; DMEPOS covered by Appendix B (ie. Manual wheelchairs and power mobility devices, including complex rehab and assistive technology) and Appendix C (ie. Custom fabricated custom fitted, custom made orthotics, prosthetic devices somatic, ocular and facial prosthetics, and therapeutic shoes and inserts)

Community Health Accreditation Program

1300 19th Street, NW
Suite 150
Washington, DC 20036
www.chapinc.org

Approved for Categories: Diabetic Supplies, Cane, Crutches, Walkers, Commode Chairs, Hospital beds, Traction Equipment

Appendix A: Respiratory equipment, supplies, and services, Oxygen concentrators, reservoirs, high-pressure cylinders, oxygen accessories and supplies, oxygen conserving devices, Home Invasive Mechanical Ventilators, Continuous Positive Airway Devices (RAD), Intermittent Positive Pressure Breathing Devices, Nebulizers

Appendix B: Manual Wheelchairs and Power Mobility Devices, including complex rehab and assistive technology, PMDs: Power wheelchairs, power operated vehicles and accessories, Manual wheelchairs, standard recliners, heavy-duty wheelchairs, standard lightweight wheelchairs, hemi wheelchairs, armrests, leg rests/footplates

Appendix C: Custom fabricated custom fitted, custom made orthotics, prosthetic devices, somatic, ocular and facial prosthetics, and therapeutic shoes and inserts

HealthCare Quality Association on Accreditation

PO Box 1946
217 West 4th Street
Waterloo, IA 50702
www.hqaa.org

Approved for Categories: All DME and Custom Orthotics

Accreditation Commission for Health Care, Inc.

4700 Falls of Neuse Road, Suite 280
Raleigh, NC 27609
www.achc.org

Approved for Categories: All DME, Respiratory, Orthotics, Rehabilitation Technology Supplier and Medical Supply Provider