

Pharmacy Credentialing Assessment



Are you easily able to complete CVS/Caremark, Catamaran and other PBM Attestations? Take our credentialing assessment and then review your results below to discover and address risks your pharmacy may experience.



1. Are you conducting FWA Prevention Training annually?

- ☐ **a. Yes-** Fantastic!
- ☐ **b. No** - Add this to your "To-do List" as this is a federal requirement if you bill Medicare Part D Health Care Programs



2. Do you have an "Anti-Kickback" Policy & Procedure (P&P)?

- ☐ **a. Yes-** Great you are meeting a federal FWA requirement
- ☐ **b. No** - Looks like you need to get one today!



3. Do you have your entire staff completing Conflicts of Interest forms annually?

- ☐ **a. Yes-** Thank Goodness- its best to have this signed!
- ☐ **b. No** - Consult your attorney and require your employees to read and sign. Keep a copy in their personnel folder



4. Are you Running OIG-GSA-SAM Exclusion Verifications each month on:

- a. Employees, Owners, and Contractors**
 - ☐ **i. Yes-** Great!
 - ☐ **ii. No-** Do this immediately! This is a mandatory requirement to bill Medicare and State Health Care Programs



4. Are you Running OIG-GSA-SAM Exclusion Verifications each month on:

b. Business Associates

- ☐ **i. Yes-** Awesome!
- ☐ **ii. No-** Start now! This is a mandatory requirement to bill Medicare and/or State Health Care Programs

c. All vendors whose products are billed through Medicare

- ☐ **i. Yes-** You are on top of things!
- ☐ **ii. No-** Do this immediately! This is a mandatory requirement to bill Medicare and State Health Care Programs



5. Do you have a HIPAA P&P manual/program in place?

- ☐ **a. Yes-** Great all medical facilities and Business Associates that view PHI are required to have one of these
- ☐ **b. No** - You need to get one in place now. This is a requirement that you MUST comply with.



6. Has your Notice of Privacy Practice been updated since July 1, 2013?

- ☐ **a. Yes-** Awesome- you meet the most recent requirements
- ☐ **b. No** - Ah-Oh- this is a very easy requirement to fix. Make sure you have the correct version and update the version that is displayed in your location, on your website, and being distributed to patients. Also check your policies and procedures, they are probably out of date as well



7. Do you maintain a breach assessment when the patient receives another patient's medication?

- ☐ **a. Yes-** Perfect you are following procedures
- ☐ **b. No** - The fine is \$150,000.00 minimum and Yes the HIPAA police have fined independent pharmacies should



8. Do you have a Quality Assurance Program?

- ☐ **a. Yes-** Fantastic you are protecting yourself and your patient files
- ☐ **b. No** - You really should invest in a program which will afford you the ability to use any adverse events as "Patient Safety Work Product" which is privileged & confidential and inadmissible as evidence, and not subject to discovery

**9. Are you enrolled in a Patient Safety Organization?**

- ☐ **a. Yes-** Hurray! Please ensure you are reporting regularly within your PSO's guidelines
- ☐ **b. No-** Please be aware that all documents can be subpoena and used against you in a court of law if you are not enrolled in a PSO

**10. Are staff members trained on CMS 10147 Adherence if a "569 error" occurs**

- ☐ **a. Yes-** Whew- this is something a lot of people miss- Good Job!
- ☐ **b. No-** This is easy to work into your training

**11. Do you have Policies and Procedures (P&P) to meet Pharmacy Medicare Part D credentialing requirements?**

- ☐ **a. Yes-** Great, CVS credentialing should be a breeze
- ☐ **b. No-** If you don't submit the requested policies and procedures, the Part D carrier can drop your pharmacy from their plan. Can you afford that?

**12. Are you keeping annual records of all trainings (HIPAA & FWA with 10 years of retention?)**

- ☐ **a. Yes-** You're on top of things!
- ☐ **b. No-** Time for more paperwork! If you don't, Medicare/Medicaid can revoke any funds for the periods you do not have documentation.

**13. Do you review your EQuIPP scores monthly?**

- ☐ **a. Yes-** Great, hopefully you are posting and reviewing with your staff so they understand the benefits of this report and can focus on areas to increase your scores
- ☐ **b. No-** Oh My Goodness!! These scores can increase your ability to gain more patients because Insurance Companies are graded and receive star ratings. If your facilities have low scores, you may lose the ability to fulfill prescriptions from some health plans.

**14. Do you have a Medication Adherence Program?**

- ☐ **a. Yes-** Splendid! This simple process will greatly help to improve your patient's medication intake and thus improve your EQuIPP scores.
- ☐ **b. No-** Adherence Programs are a great way to guarantee patients get their medications on time and do not miss dosages or days.



15. Do you have P&P's for Usual and Customary

- ☐ **a. Yes-** Great you are implementing a good practice and preparing yourself for a credentialing request.
- ☐ **b. No-** Not only is this a good practice to have in place, but some insurance companies are requiring this during their credentialing process



16. Do you have P&P's for Patient Counseling Practices

- ☐ **a. Yes-** Great you are implementing a good practice and preparing yourself for a credentialing request.
- ☐ **b. No-** Not only is this a good practice to have in place, but some insurance companies are requiring this during their credentialing process



17. Do you have P&P's for Mis-fill Procedures

- ☐ **a. Yes-** Great you are implementing a good practice and preparing yourself for a credentialing request.
- ☐ **b. No-** Not only is this a good practice to have in place, but some insurance companies are requiring this during their credentialing process



18. Do you have P&P's for Medication Recall procedures

- ☐ **a. Yes-** Great you are implementing a good practice and preparing yourself for a credentialing request.
- ☐ **b. No-** Not only is this a good practice to have in place, but some insurance companies are requiring this during their credentialing process



19. Do you have P&P's for Medication Expiration Procedures

- ☐ **a. Yes-** Great you are implementing a good practice and preparing yourself for a credentialing request.
- ☐ **b. No-** Not only is this a good practice to have in place, but some insurance companies are requiring this during their credentialing process



20. Do you have P&P's for Generic/Brand Price Disclosures

- ☐ **a. Yes-** Great you are implementing a good practice and preparing yourself for a credentialing request.
- ☐ **b. No-** Not only is this a good practice to have in place, but some insurance companies are requiring this during their credentialing process



21. Do you have P&P's for Demographics and Allergy Capture

- ☐ **a. Yes-** Great you are implementing a good practice and preparing yourself for a credentialing request.
- ☐ **b. No-** Not only is this a good practice to have in place, but some insurance companies are requiring this during their credentialing process



22. Do you have P&P's for Partial Refills

- ☐ **a. Yes-** Great you are implementing a good practice and preparing yourself for a credentialing request.
- ☐ **b. No-** Not only is this a good practice to have in place, but some insurance companies are requiring this during their credentialing process



23. Do you have P&P's for Return to Stock

- ☐ **a. Yes-** Great you are implementing a good practice and preparing yourself for a credentialing request.
- ☐ **b. No-** Not only is this a good practice to have in place, but some insurance companies are requiring this during their credentialing process

HOW DID YOU DO?

Concerned about your results?

Need help understanding what you need to do next?

Schedule a complimentary 1-on-1 with our Compliance Strategists.

Go to

www.RJHedges.com/appointment
to schedule your session now or call
724-357-8380.



R.J. Hedges & Associates was created in 2006 to help independent pharmacies feel at ease when it comes to compliance. We have helped hundreds of independent pharmacies stay compliant, pass audits, inspections and easily earn Medicare accreditation. The programs we offer are completely customized for your pharmacy.

We're here to help you stay stress-free and in compliance!

2016 Copyright RJ Hedges & Associates

CONTACT US



(724) 357 – 8380



www.rjhedges.com



Sales@rjhedges.com