

# COMPLIANCE VERIFICATION

## BENEFACT UPDATE

NUMBER 1 • JULY 2019

### Overview

As an authorized provider, all pharmacies with an active Alberta Blue Cross Pharmaceutical Services Provider Agreement (Agreement) are bound by all the terms and conditions contained therein. It is the responsibility of the pharmacy provider to be familiar with and understand all the requirements of their agreement. As outlined in the Agreement, all claims submitted to Alberta Blue Cross for payment are subject to Compliance Verification Reviews and Alberta Blue Cross retains the right to recover payments when appropriate.

Alberta Blue Cross's expectation is that claims must be submitted according to

- all requirements of the Agreement;
- applicable legislation and ministerial orders;
- regulatory body standards of practice;
- plan coverage; and
- Alberta Blue Cross policies and standards.

When findings are identified in a Compliance Verification Review, there are several actions that Alberta Blue Cross can take, depending on the nature, severity and financial significance of the findings. These include

- recovery of overpayments;
- report the findings to the Alberta College of Pharmacy;
- termination of the Alberta Blue Cross Pharmaceutical Services Provider Agreement;
- pursue civil action; and
- report the findings to law enforcement.

### Common areas of non-compliance and overpayments

The following are common areas where claims for payment by pharmacies are not compliant, which can result in overpayments.

The requirements listed below should be reviewed in conjunction with the following:

- The Alberta Blue Cross Pharmaceutical Services Provider Agreement (<https://www.ab.bluecross.ca/providers/pharmacy-agreement.php>)
- Reference Guide for Alberta Pharmacies (<https://www.ab.bluecross.ca/providers/pharmacy-resources.php>)

#### 1. Documentation Requirements

Claims require supporting documentation, as outlined in all applicable sources as referenced above and must be completed and included at the time of the claim for the documentation to support claims to Alberta Blue Cross.

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## 2. Frequent Dispensing

Pharmacies must follow the requirements and obligations of the Agreement and the Quantitative Limits section of the Reference Guide for Alberta Pharmacies when submitting claims with frequent dispensing.

## 3. Corresponding frequency of claiming and dispensing

Claims must be submitted with the same frequency as the drug product is provided to the plan member. That is, the days supply submitted MUST correlate directly to the amount dispensed to the plan member.

## 4. Pharmacy inventory to support claims

Pharmacies must retain all invoices and other documentation regarding drug product purchases as it is required to support claims to Alberta Blue Cross. For clarity, the volume of claims submitted for any dispensed drug product must correlate to the volume of drug product ordered by the pharmacy.

## 5. Co-payment discounting

The Agreement outlines the pharmacy's obligations to collect the co-payment from plan members. Where the benefit plan requires a plan member to pay a portion of the cost of their prescriptions, the pharmacy is required to collect the full amount from the plan member. Any and all reductions to the co-payment amount whereby the plan member is not directly contributing towards said amount, must be shared proportionally between the plan member and Alberta Blue Cross. That is, the same reduction in co-payment amount that is granted to the plan member by the provider must also be granted to Alberta Blue Cross by the provider.

## 6. Best price clause

Pharmacies must ensure that the total amount charged to a plan member does not exceed the amount charged to any other Alberta Blue Cross plan member, any customers covered by other insurance carriers or any cash-paying customers for the same drug product.

For additional information on the topics above, a supplementary Compliance Verification Benefact Number 1A (July 2019) is available at <https://ab.bluecross.ca/providers/pharmacy-home.php>. We encourage pharmacists to review the additional detailed information.

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### When you have questions:

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](https://ab.bluecross.ca/providers/pharmacy-home.php)



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