

Medicaid Entrance Conference Format, Issues and Check List

This Medicaid audit interview was conducted by a non government staff person, who is employed by a separate company to conduct the interview. The meeting started with everyone signing their name on a sign-in sheet.

The auditor then explained what was going to happen in the actual audit. Scanners were going to come in on Monday and will bring their own scanning machine. They will request 50 scripts at a time to be pulled by the pharmacist or staff but they can help if need be. Also, in today's visit, the auditor asked to see the daily logs to see what information is on it. The auditor also looked at what information is on a patient profile. Note that depending upon who is conducting the audit the format may vary. Some auditors in the downstate area ask if the pharmacist would copy the prescriptions for the auditor. Additionally, some auditors insist on pulling the prescriptions themselves when in reality the pharmacy should be doing the pulling to protect non Medicaid patient privacy concerns. Some auditors will provide the date range or actual Rx numbers while others may not. The scope of time the audit covers should be disclosed at the entrance conference, ie, for 2006 and 2007 etc.

The auditor then continued to explain what the interview is for and some of the logistics of the audit. They are going to take copies of 200 scripts. The auditor mentioned if any scripts can not be found, then they have 1-2 weeks to come up with them and they can still be reviewed. The auditor then explained the interview is for compliance with pharmacy regulations and said the auditor is going to ask simple questions about how the ~~pharmacy is run.~~

This auditor happen to mention that Medicaid has started to ease up or relax on quite a few things. The auditor said that not having an address or date of birth on a script isn't a problem anymore as long as that information is in the patient profile. There appears to be variations in enforcement of particular rules depending upon who is conducting the audit and where in NYS it is conducted.

The following is a list, in order, of the questions asked to the pharmacist by the interviewer. The interview was not taped so they are not word for word; however, they are fairly detailed.

- 1) Are you licensed to dispense controlled substances for addiction?
- 2) Do you have your pharmacy license with your license number and expiration date and can I see it?
- 3) How many technicians do you have? Are they certified? What are their names?
- 4) Do you have any interns?
- 5) Do you have any clerks? Names are not necessary.
- 6) How would you separate your duties as a pharmacist vs. duties of technicians and interns?
- 7) Are your technicians involved in actual preparation? Can they pull medications and prepare?
- 8) Can your technicians accept telephone orders?
- 9) What kind of system do you run? (i.e. bucket system)
- 10) Are technicians able to prepare controlled substances?

- 11) Do technicians enter the data when a new script comes in?
- 12) How are labels generated? Are they generated by the pharmacist?
- 13) How do you handle your delivery system?
- 14) Do you have a separate log for your deliveries?
- 15) Does your delivery log indicate who receives the drug?
- 16) Does the driver know what drugs are in the bag?
- 17) Is there anything on the script itself that says it was delivered?
- 18) What is the process of filling an actual prescription? (Review from previous question to make sure she got it right)
- 19) Are there 2 labels generated?
- 20) What is your dispensing process like? Do you use sealed bags?
- 21) What is the customer's role in picking up a prescription?
- 22) Does the customer take a HIPAA form home or may they take one?
- 23) Is there any time limit to pull the drugs if someone hasn't picked it up?
- 24) How do you handle a script with no refills left?
- 25) Do you use a specific form for telephone orders?
- 26) When do you type or key in telephone orders?
- 27) What about electronic orders? Are they different from the fax refill request?
- 28) Do you find electronic orders easy to work with in your system?
- 29) Do you have a retail drug list that you keep?
- 30) Are controlled substances locked and only accessible by pharmacists?
- 31) Is there any difference in preparation of controls than non-controlled drugs?
- ~~32) Are your Rx numbers 6 digits?~~
- 33) Is there any designation in numbers between controls and non-controls?
- 34) When a person comes in for a 3rd or 4th refill on a control, is the script tagged each time?
- 35) If you are not familiar with a physician, do you have a system to look up physicians?
- 36) Do you get a lot of scripts signed by residents? Is that a problem?

After asking these questions, the interviewer then proceeded to look at the pharmacist's license, the daily logs and a patient profile. Overall, it seemed like the interviewer was just trying to get as much information as possible. She wrote everything down. She came with a form with spaces to write the answers to each question, however, the spaces did not have enough room and she ended up using the back of the paper. The interview seemed straight forward and took approximately 1-2 hours.

In some other entrance conferences, the auditors also did a name check against the New York State Disqualified Provider List and the Federal OIG excluded provider list to see if any prohibited health care practitioners have been employed and were involved in the dispensing of Medicaid prescriptions. The auditor also may ask for a copy of the most recent DEA controlled substance bi-annual inventory and a copy of the New York State mandated prescription price listing of the top 150 medications and the corresponding retail price for these medications in specific quantities that would be charged to cash paying patients.