

Medicare Part B Issues Checklist

NCPA has learned that some members are confused about various Part B issues of importance community pharmacy. Outlined below is a checklist that we hope will provide further clarity on those issues. If you have additional questions or concerns, please contact Chris Smith, Director of Policy and Regulatory Affairs at chris.smith@ncpanet.org.

Competitive Bidding

- Retail pharmacy is presently excluded from the competitive bidding program for diabetic testing supplies.
- In the future, probably in 2013, CMS will be implementing a national mail order competitive bidding program for mail order diabetic testing supplies. Retail pharmacy home delivery of mail order diabetic testing supplies will be considered mail order, and if you provide home delivery of mail order diabetic testing supplies, once the national mail order program is implemented, then those supplies will be subject to competitive bidding. However, retail supplied diabetic testing supplies which are picked up by the customer at the storefront will remain excluded from competitive bidding under the national mail order program.
- In 2016, competitive bidding pricing will be imposed on all diabetic testing supplies, regardless of whether those supplies are supplied by mail order companies or retail pharmacies and regardless of whether those items are home delivered or picked up at the storefront.
- NCPA is presently lobbying for legislation to permanently exempt independent community pharmacies from competitive bidding for diabetic testing supplies and to permanently allow those pharmacies to provide home delivery of diabetic testing supplies outside of the competitive bidding program.

Accreditation Exemption

- Retail pharmacies are exempt from accreditation requirements for DME suppliers provided:
 - The total billings by the pharmacy for DME are less than 5 percent of total pharmacy sales for the previous 3 calendar years;
 - The pharmacy has been enrolled as a DME supplier and has been issued a provider number for at least 5 years;
 - No final adverse action has been imposed on the pharmacy in the past 5 years;
 - The pharmacy submits an attestation to the three requirements above; and
 - The pharmacy agrees to submit materials as requested during the course of an audit conducted on a random sample of pharmacies selected annually.
- Each individual store under common ownership must meet the requirements above in order to be eligible for exemption.

Surety Bond Requirement

- DME supplying retail pharmacies are still subject to the surety bond requirement, even if they are exempt from accreditation.