

#### How to Claim Your CE Credit

#### For CE credit, please visit:

https://www.lecturepanda.com/r/2025NCODASpringForum

- Credit requirements must be completed within 60 days of the program activity date.
- Upon completion, credit will be transmitted electronically to ACPE.
- All transmitted credit will be viewable in your CPE Monitor profile within 24 hours.
- CE codes will be displayed at the end of the presentation and will not be redistributed after this presentation.





# Managed Care Decoded: Winning Strategies for Oncology Billing & Audits

#### Peter Mertens, MBA, CPhT

Pharmacy Audit and Compliance Manager Texas Oncology

#### Jacqueline Caban, MPA

Manager of Patient Assistance Programs
Bon Secours Mercy Health



#### OBJECTIVES

- Discuss accurate billing practices for Part B medications, including oral oncolytics and IV therapies, to ensure compliance with payer requirements.
- 2. Recognize CMS and commercial payer contracting, reimbursement strategies, and policy variations to optimize managed care billing in oncology.
- 3. Identify common audit triggers in oncology billing and their effects on compliance risks and claim denials.
- 4. Outline effective audit response strategies as they relate to auditor expectations, required documentation, and best practices for appeals.



#### DISCLOSURES

There are no relevant conflicts of interest to disclose for this presentation for the following faculty and reviewers of this CE activity:

- Peter Mertens, MBA, CPhT
- Jacqueline Caban, MPA
- Taryn Newsome, CPhT
- Tahsin Imam, PharmD
- Daisy Doan, PharmD



## Oral Oncolytic Billing



## Overview of Oral Oncolytic Part B Medications

- Medicare Part B pays for 80% of medication costs.
- Patient coinsurance for 20% after the annual deductible has been met.
- Medicare Supplemental plans may cover the 20% OOP\*
  - Starting in 2020 it cannot be applied toward the annual Medicare deductible.
- Medication coverage is dependent on a valid diagnosis.
- The medication refill date is 7 days or less prior to the last fill.



### Oral Oncolytic Part B Medications

#### **Oral Oncolytics**

- Capecitabine
- Temozolomide
- Etoposide
- Cyclophosphamide
- Melphalan

## Transplant/ Immunosuppressives

- Tacrolimus
- Sirolimus

## Antiemetics (That are part of the regimen)

- Aprepitant
- Ondansetron



## Common Billing Errors for Oral Oncolytics



- Billing Medicare B for self-administered medications that do not meet their criteria
- Using the incorrect HCPCS code (ICD-10)
- Submitting a claim with missing or incorrect information
- Verify if the patient has a Medicare B supplemental plan to cover Part B (Out of Pocket) OOP cost
- Filling for more than 1 month at a time
- Duplicate claim submission
- Oral anti-emetics should be used as a replacement for IV administration if billed under Part B
- Medication is filled outside the 7-day window



#### Best Practices for Billing Success

- The script and label must match
- The script should reflect what is on the patient's chart (clean script)
- During a Part A-covered nursing home stay, prescription drugs are covered by Part A, not Part D
  - If a patient is entering a nursing home or transitioning from another setting, their plan must provide a 31-day emergency supply of medications while an exception request is processed
  - Also applies to patients in rehab for over 30 days
- If a Medicare Part B refill is mailed out, a medication refill form is required by CMS to be filled out and maintained in a file by the pharmacy (see example)
- Billing must occur on the date of sale

Y								
Medic	cation Refill Request <u>(sample)</u>							
Name:	John Doe							
DOB:	01/02/1957							
Medical Record #	987654							
Medicare #	D123-AB4-C56E							
Date of Contact with Beneficiary	03/18/2022							
	Requested Items							
Rx#	87654321							
LAST Fill date	02/10/2022							
Medication	Temozolomide 100mg							
Directions	Take 1 capsule by mouth on days 1-5 of each cycle							
Remaining quantity	Ó							
Rx#								
LAST Fill date								
Medication								
Directions								
Remaining quantity								
	1							
•	orized by):Mrs. Jane Doe							
Relationship with th	ne Beneficiary (if applicable):Wife							
Staff member name: _ A. Sı	mithdate: _03/18/2022							
Y	our Plenamäcy (your location here) Site address City, State and Zip Code							

#### QUESTION 1

What is the most appropriate step if the directions on an oral oncolytic e-script are unclear?

- a. Fill out the prescription and clarify later
- b. Annotate the e-script with your best guess
- c. Get a new e-script, but if not practical, contact the prescriber, annotate, and initial/date
- d. Submit a prior authorization instead



## IV Chemotherapy Billing



## Medical Infusion Billing Overview



**UB-04** 

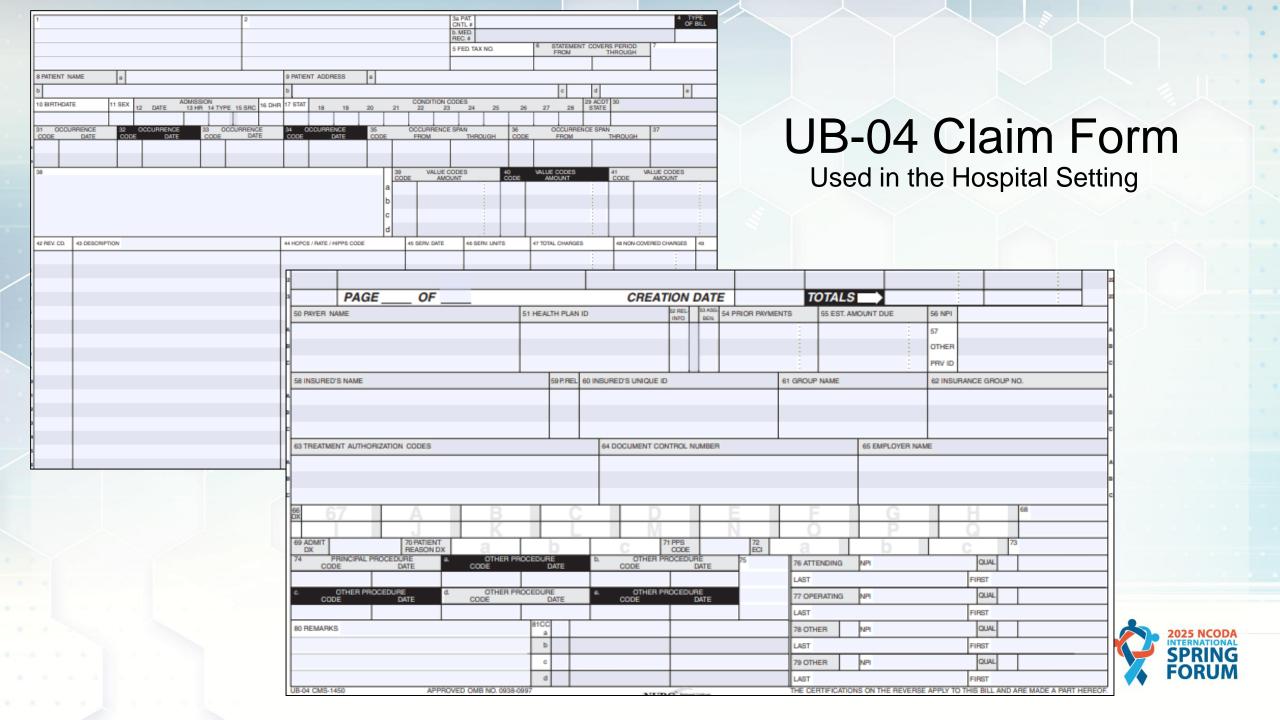


#### CMS-1500 Claim Form

HEALTH INSURANCE CLAIM FORM		
APPROVED BY NATIONAL UNIFORM CLAIM COMMITTEE (NUCC) 03	972	
PICA		PICA
	MAPYA GROUP FECA OTHER Ta. INSURED'S LD. NUMBER (For Program in their IDI) (IDI) (IDI)	tiem 1)
2. PATIENT'S NAME (Last Name, First Name, Middle Initial)	3. PATIENT'S BIRTH DATE SEX 4. INSUREC'S NAME (Last Name, First Name, Middle Initial)	
5. PATIENT'S ADDRESS (No., Street)	6. PATIENT RELATIONSHIP TO INSURED 7. INSURED'S ADDRESS (No., Street)	
CITY	Self Spouse Child Other ST CITY S	TATE
Cary	A.E. B. RESIGNATO FOR NOCC COS.	IAIE
TELEPHONE (Include Area Code)	ZIP CODE TELEPHONE (Include Area Co	xde)
9. OTHER INSUREIO'S NAME (Last Name, First Name, Mode Initial)	10. IS PATIENT'S CONDITION RELATED TO: 11. INSURED'S POLICY GROUP OR FEICA NUMBER	
B. OTHER INSURED'S POLICY OR GROUP NUMBER	a. EMPLOYMENT? (Current or Previous)  a. INSURED'S DATE OF BIRTH  VES NO M DO Y  M S	
b. RESERVED FOR NUCC USE	b. AUTO ACCIDENT? PLACE (State) b. OTHER CLAIM ID (Designated by NUCC)	
c. RESERVED FOR NUCC USE	C. OTHER ACCIDENT?  G. INSURANCE PLAN NAME OR PROGRAM NAME  VES NO	
G. INSURANCE PLAN NAME OR PROGRAM NAME	10d. CLAIM CODES (Designated by NUCC)  d. IS THERE ANOTHER HEALTH BENEFIT PLANT  VES NO # year complete terms 8, 6s, and	194.
READ BACK OF FORM BEFORE COMPLE 12. PATIENT'S OR AUTHORIZED PERSON'S SIGNATURE 1 suborize to process this claim. I also request payment of government benefits at below.  SIGNED	to the release of any medical or other information necessary payment of medical benefits to the undersigned physician or a	
14. DATE OF CURRENT ILLNESS, INJURY, or PREGNANCY (LMP)	15. OTHER DATE OUAL  16. DATES PATIENT UNABLE TO WORK IN CURRENT OCCUP FROM TO TO	ATION
17, NAME OF REFERRING PROVIDER OR OTHER SOURCE	17A 18. HOSPITALIZATION DATES INSLATED TO CURRENT SERVI	CER
19. ADDITIONAL CLAIM INFORMATION (Designated by NUCC)	20. OUTSIDE LAB? S CHARGES  YEB NO	
21. DIAGNOSIS OR NATURE OF ILLNESS OR INJURY Reine A-L to	p sendos (the below (\$40) ICD Ind. 22. RESUBMISSION ORIGINAL REF. NO.	
AL B.L.	a.L	
E.L	Q. L 23. PRIOR AUTHORIZATION NUMBER	
	K	

-	24. A	DATE(S) From DO YY	OF SERVI	To	B. PLACE YY SERVI		O. PROCEDURE (Explain Ura CPT/HCPCS		umstano		S E. DIAGNO POINT		F. CHARGES	OR LAPTS	H. Party Party	E.	RENDERING PROVIDER ID. #
1								1				1				NPI	ORIM
2			1					1				1				NPI	
3				-								+					
4					Ť			-				1				NPI	OR SU
5				-	+	-			-			+				NPI	DIAN
6					+							+			-	NPI	HASH
Ĭ	26. FEE	DERAL TAX	D. NUMBE	R	SSN EIN	26.	PATIENTS ACCO	UNT NO.	2	7. ACCEPT	ASSIGNMENT NO NO	7 28.TO	OTAL CHARGE	8	AMO	NP9 UNT PA	ID 30. Ravel for NUCC Use
	31. SIGNATURE OF PRYSICIAN OR SUPPLER INCLUDING DEGREES OR CREDENTIALS (conflict that the statements on the reverse apply to this bill and are made a part thereof.)			52.	SE. SERVICE FACILITY LOCATION INFORMATION					33. 8	33. BELING PROVIDER INFO & PH # ( )				)		
	SIGNE	D		0	DATE	à.	NPI	E.				6.	NPI	b			+





#### Billing Modifiers & Status Indicators

- Billing Modifiers Provide additional information about a procedure or service
  - Modifiers are two-digit alphanumeric codes added to a Current Procedural Terminology (CPT) or Healthcare Common Procedure Coding System (HCPCS) code to provide context
- Status Indicators Clarify the payer's payment rules or policies for a specific procedure code
  - Describe the payment rules for a particular procedure



## Common HCPCS Modifiers in Oncology Billing

#### **HCPCS J-Codes (Drug Codes)**

- Definition: J-codes are part of the HCPCS Level II code set used to identify injectable drugs and infused chemotherapy agents
- Example: J9190 Injection, fluorouracil, 500 mg
- Use: Required for billing Medicare and commercial payers for drugs administered in clinical settings



### Billing Modifiers Definitions

	Modifier	Definition	Purpose				
	JG	Drug acquired with 340B discount	Required on institutional claims (before 1/1/25)				
	TB	340B-acquired drug (effective 1/1/25)	Replaces JG under OPPS for Medicare				
<b>JW</b> Dru		Drug amount discarded	Reports wastage from single-use vials				
	JZ	No drug wastage	Required when no leftover drug remains				
	K	Status Indicator – Non-pass-through drug Outpatient Prospective Payment System (OPPS)	Affects how CMS reimburses hospitals				
	G	Status Indicator – Pass-through drug (OPPS)	Temporarily reimbursed separately from				
			ambulatory payment classifications (APC)				
			bundle				



## New Technology Add-on Payment (NTAP)

The New Technology Add-on Payment (NTAP) program provides additional Medicare reimbursement to hospitals for certain new, high-cost medical services and technologies that are not fully compensated by the standard Medicare Severity-Diagnosis Related Group (MS-DRG) payments



## 340B Drug Pricing Program

#### What is the 340B Program?

- A federal program that allows eligible hospitals and clinics to purchase outpatient medications at discounted prices from manufacturers
- Intended to stretch scarce federal resources, allowing providers to:
  - Serve more eligible, low-income patients
  - Deliver comprehensive care
  - Reduce financial burden on the healthcare system



### 340B Eligibility Review

#### Who Qualifies for 340B?

Covered entities must meet eligibility requirements regulated by HRSA (Health Resources and Services Administration)

#### **Common Eligible Entities:**

- Federal grantee organizations
- Disproportionate Share Hospitals (DSH)
- Must serve a high volume of low-income or indigent patients
- Critical Access Hospitals (CAHs)
- Sole Community Hospitals (SCHs)
- Rural Referral Centers (RRCs)



#### QUESTION 2

Which modifier should be used on claims for 340B drugs to indicate discounted acquisition cost after January 1, 2025?

a. JW

b. TB

c. JG

d. NTAP



## Audit Response & Appeals



#### Initial Audit Response

- Read audit requests carefully
- Gather and collate documentation
  - Present the documents in the order listed on the request
- Make sure:
  - All documents are legible
  - All requested items are included
    - >Rx Hardcopy, Backtag, Signature Log, etc.
- Submit all requested documentation before the due date



#### Reconsideration/Appeal

- Review all audit findings for accuracy

  Auditors do make mietals all
  - O Auditors do make mistakes!
- Gather and collate any additional documentation that could refute findings
- Submit additional documentation before the reconsideration/appeal deadline
- Don't let anything go!



### **Audit Triggers**

High \$\$ Claims

Quantity
Dispensed &
Day Supply

Excessive
Dispense As
Written (DAW)
>0

**Drug Mix** 

Reversals

Member or Plan Sponsor Referrals

Random Selection



#### What Causes Audit Citations?

- Differences between what is on the prescription and what is on the computer prescription label
- Failure to comply with requirements outlined in the pharmacy benefits manager (PBM)'s provider manual
- Failure to comply with legal requirements
- Failure to follow manufacturer/FDA requirements (Storage, Risk Evaluation and Mitigation Strategy (REMS))



#### Keys to Successful Audit Outcomes

- Everything on the pharmacy label should match the e-script:
  - Prescriber, Patient, Drug/Strength, Directions, DAW, Quantity, Calculable Days Supply
- If anything is not going to match, it's best to get a new e-script
  - As Directed, Incorrect Quantity, Confusing Directions
- When a new e-script is not possible, annotation of the e-script is acceptable
  - Date and initial any annotations
- If any overrides are used (i.e. Vacation Supply), document the reason on the e-script



#### **Correct Annotation**

- When annotating an e-script, be sure that it is initialed and dated (the date of the original fill)
- Example: 9/12/24 verified with Dr. Smith that TDD = 8mg PJM
- Annotation vs clean script



#### QUESTION 3

Which of the following scenarios is most likely to result in an audit citation during a PBM or payer review?

- a. Label instructions exactly match the original e-script and all documentation is complete
- b. A prescription is filled and shipped despite a mismatch between the prescriber's directions and the label, with no annotation
- c. A specialty drug is stored according to REMS and temperature requirements
- d. PBM provider manual guidance is followed when choosing the billing NDC



## Audit Triggers & Red Flags



## Missing Directions

```
Palbociclib Oral 100 mg tablet (Tablet)
Written Date
NDC Sent: 00069-0486-07
NDC Used: 00069-0486-07 IBRANCE 100 MG TABLET
DAW: NO
Quantity
Oirections: 1 capsule orally every day, on days 1-21 of each 28-day cycle. Take whole with water and food, at the same time each day.

Refills: 6
Comments:
```

TAKE 1 TABLET BY MOUTH DAILY ON DAYS 1-21 OF EACH 28-DAY CYCLE.

Qty:21 IBRANCE 100 MG TABLET

Substituted for: IBRANCE 100 MG TABLET

MFG: PFIZER US PHARM DISCARD 01/10/25

00069-0486-03 Safety Caps: Yes Fills Remaining: 4 REFILLS



OptumRx. Optum Rx Pharmacy Provider Manual. United Health Group. Published 2024. Accessed April 15, 2025.

https://professionals.optumrx.com/content/dam/o4-dam/resources/pdfs/provider-manuals/optum-rx-pharmacy-provider-manual.pdf

Prime Therapeutics. Pharmacy Provider Manual January 2025. Published January 2025. Accessed April 15, 2025.
 https://www.primetherapeutics.com/documents/d/primetherapeutics/document-primeprovidermanual-jan2025-1

### Incalculable Days Supply

```
Dexamethasone Oral 4 mg tablet (Tablet)
Written Date:
    NDC Sent: 60219-2043-01
    NDC Used: 60219-2043-01 DEXAMETHASONE 4 MG TABLET
    DAW: No
    Quantity: 30

Directions: 20 mg orally As Directed. Take 12 and 6 hours prior to paclitaxel.

Refills: 5
Comments:
```



<sup>•</sup> OptumRx. Optum Rx Pharmacy Provider Manual. United Health Group. Published 2024. Accessed April 15, 2025.

https://professionals.optumrx.com/content/dam/o4-dam/resources/pdfs/provider-manuals/optum-rx-pharmacy-provider-manual.pdf

Prime Therapeutics. Pharmacy Provider Manual January 2025. Published January 2025. Accessed April 15, 2025.
 https://www.primetherapeutics.com/documents/d/primetherapeutics/document-primeprovidermanual-jan2025-1

## Confusing Directions

```
RX INFO:

Cabometyx (Cabozantinib Oral (Cabometyx)) 40 mg tablet (Tablet)

Written Date:

NDC Sent: 42388-0025-26

NDC Used: 42388-0025-26 Cabometyx (Cabozantinib Oral (Cabometyx)) 40 mg tablet

DAW: No
Quantity:

Oirections: 1 tablet orally every day. 1 PO EVERY OTHER DAY

Refills: 5
Comments:
```

TOME 1 TABLETA POR LA BOCA CADA OTRO DIA

Qty: 15 CABOMETYX 40 MG TABLET

Substituted for: CABOMETYX 40 MG TABLE

MFG: EXELIXIS, INC. DISCARD 01/22/25

42388-0025-26 Safety Caps: Yes Fills Remaining: 3.5 REFILLS



- OptumRx. Optum Rx Pharmacy Provider Manual. United Health Group. Published 2024. Accessed April 15, 2025.
  - https://professionals.optumrx.com/content/dam/o4-dam/resources/pdfs/provider-manuals/optum-rx-pharmacy-provider-manual.pdf
  - Prime Therapeutics. Pharmacy Provider Manual January 2025. Published January 2025. Accessed April 15, 2025. https://www.primetherapeutics.com/documents/d/primetherapeutics/document-primeprovidermanual-jan2025-1

### Too Many Refills

```
RX INFO:

Cabometyx (Cabozantinib Oral (Cabometyx)) 60 mg tablet (Tablet)

Written Date

Effective Date:

NDC Sent: 42388-0023-26

DAW: NO

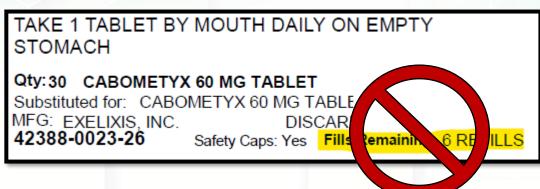
Quantity: 30

Days Supply:

Directions: 60 mg orally daily. Take on an empty stomach.

Refills: 5

Comments:
```



- OptumRx. Optum Rx Pharmacy Provider Manual. United Health Group. Published 2024. Accessed April 15, 2025.
  - https://professionals.optumrx.com/content/dam/o4-dam/resources/pdfs/provider-manuals/optum-rx-pharmacy-provider-manual.pdf
  - Prime Therapeutics. Pharmacy Provider Manual January 2025. Published January 2025. Accessed April 15, 2025. https://www.primetherapeutics.com/documents/d/primetherapeutics/document-primeprovidermanual-jan2025-1

#### **Units and Route**

```
RX INFO:

TBO-Filgrastim (Granix) 480 MCG/0.8 ML DISP.SYRIN (Milliliter)
Written Date:
Effective Date:

NDC Sent: 63459-0912-11
DAW: NO
Quantity: 14
Days Supply:
Directions: 480 MCG IV DAILY
Refills: 0
Comments:
<BeginSureScripts>Item Description:TBO-Filgrastim (Granix) 480
MCG/0.8 ML DISP.SYRINQty units:14 Milliliter<EndSureScripts>
```

#### INJECT CONTENTS OF SYRINGE SUBCUTANEOUSLY DAILY

Qty: 11.2 GRANIX 480 MCG/0.8 ML SAFE SYR

Substituted for: GRANIX 480 MCG/0.8 ML S.

MFG: CEPHALON, INC.-T DISCARD 01/24/25

63459-0912-11 Safety Caps: Yes Fills Remaining: NO REFILLS



OptumRx. Optum Rx Pharmacy Provider Manual. United Health Group. Published 2024. Accessed April 15, 2025.

https://professionals.optumrx.com/content/dam/o4-dam/resources/pdfs/provider-manuals/optum-rx-pharmacy-provider-manual.pdf

Prime Therapeutics. Pharmacy Provider Manual January 2025. Published January 2025. Accessed April 15, 2025.
 https://www.primetherapeutics.com/documents/d/primetherapeutics/document-primeprovidermanual-jan2025-1

### Total Daily Dose Confusion

```
RX INFO:
Axitinib Oral 1 mg tablet (Tablet)
  Written Date:
Effective Date:
      NDC Sent: 00069-0145-01
           DAW: No
      Quantity: 240
   Days Supply:
  Directions: 4 mg orally every 12 hours. Take whole with water,
                with or without food at the same times each day.
                Total daily dose is 10 mg.
       Refills: 5
      Comments:
  <BeginSureScripts>Item Description: Axitinib Oral 1 mg tabletQty
  units: 240 Tablet Primary Diagnosis: ICD10:C641<EndSureScripts>
```



<sup>•</sup> OptumRx. Optum Rx Pharmacy Provider Manual. UnitedHealth Group. Published 2024. Accessed April 15, 2025.

https://professionals.optumrx.com/content/dam/o4-dam/resources/pdfs/provider-manuals/optum-rx-pharmacy-provider-manual.pdf

Prime Therapeutics. Pharmacy Provider Manual January 2025. Published January 2025. Accessed April 15, 2025.
 https://www.primetherapeutics.com/documents/d/primetherapeutics/document-primeprovidermanual-jan2025-1

#### Inappropriate DAW Usage

```
RX INFO:
Dasatinib Oral 50 mg tablet (Tablet)
  Written Date: 02/19/2025
Effective Date:
      NDC Sent: 60505-3629-06
           DAW: No
      Quantity: 60
   Days Supply: 30
  Directions: 1 tablet orally 2 times per day. 1 tablet orally 2
                times per day. Take whole with water. Take antacids 2
                hrs before or 2 hrs after each dose. Do not take
                H2-antagonist or PPI.
       Refills: 3
      Comments:
  DAW1 Brand Med Necessary <BeginSureScripts>Item
```



OptumRx. Optum Rx Pharmacy Provider Manual. UnitedHealth Group. Published 2024. Accessed April 15, 2025.

https://professionals.optumrx.com/content/dam/o4-dam/resources/pdfs/provider-manuals/optum-rx-pharmacy-provider-manual.pdf

Prime Therapeutics. Pharmacy Provider Manual January 2025. Published January 2025. Accessed April 15, 2025.
 https://www.primetherapeutics.com/documents/d/primetherapeutics/document-primeprovidermanual-jan2025-1

## Sold > 14 Days After Fill

TAKE 1 CAPSULE PIO OUTH DAILY FOR 21 DAYS, THEN OF 10 OR 7 DAYS.

Qty: 21 POMALYST 4 MG CAPSULE

Substituted for: POMALYST 4 MG CAPSULE

MFG: CELGENE/BMS

DISCARD 01/20/24

59572-0504-21 Safety Caps: Yes Fills Remaining: NO REFILLS

nsaction		Customer						
Store: TONP14 Tran: 51726	Code:	Code:						
Date: Feb 14, 2023 17:06:27 Pts Redeemed:0	Name:							
PM: REGULAR EM: Cur Pts (Before Txn):0	Street:	Street:						
Type: Reg Sale Earned Pts/Today: 0 / 21719	City:	City:						
C:SAUCEJ2 JESUS D:Tuesday Stop: 17:06:42	Postal:	Postal:						
Item	'	Qty	Unit	Ext				
01 PRESCRIPTION		1.000	0.00	0.00				
Rx Reference: 10444386								
Rx Number								
d								
Signature		COVIC	161					
Rx		COV 19	179					



<sup>•</sup> OptumRx. Optum Rx Pharmacy Provider Manual. UnitedHealth Group. Published 2024. Accessed April 15, 2025.

https://professionals.optumrx.com/content/dam/o4-dam/resources/pdfs/provider-manuals/optum-rx-pharmacy-provider-manual.pdf

Prime Therapeutics. Pharmacy Provider Manual January 2025. Published January 2025. Accessed April 15, 2025. https://www.primetherapeutics.com/documents/d/primetherapeutics/document-primeprovidermanual-jan2025-1

### Packaging & Days Supply

```
RX INFO:

Idhifa (Enasidenib Oral) 100 mg tablet (Tablet)

Written Date:

Effective Date:

NDC Sent: 59572-0710-30

DAW: No

Quantity: 21

Days Supply: 21

Directions: 1 tablet orally daily. 1 Tablet PO QDAY Days 8-28

during induction

Refills: 5

Store at 20°C-25°C (68°F-77°F); excursions permitted by
```

Store at 20°C-25°C (68°F-77°F); excursions permitted between 15°C-30°C (59°F-86°F) [see USP Controlled Room Temperature]. Keep the bottle tightly closed. Store and dispense in the original bottle (with a desiccant canister) to protect from moisture.

TAKE 1 TABLET BY MOUTH ONCE DAILY (ON DAYS 8-28 DURING INDUCTION)

Qty: 21 IDHIFA 100 MG TABLET

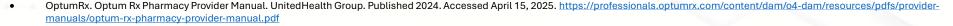
Substituted for: IDHIFA 100 MG TABLET

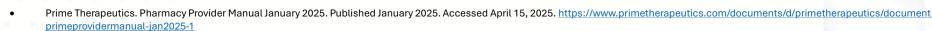
MFG: CELGENE/BMS

DISCARD 09/06/25

59572-0710-30

Safety Caps: Yes Fills Remaining: 3 REFILLS







## Packaging & Days Supply (cont.)

- If a prescription is written for a lower than usual dose of a drug that must be dispensed in its original packaging, causing the days supply to be greater than 30 days:
  - Call the PBM for an override
  - If the PBM won't give an override, fill for the full package size using 30 days supply (Be sure to get a new e-script with the full pack quantity)
  - Annotate the e-script and document that the PBM refused the override
- There are typically no recoupments for incorrect days supply. A recoupment will only happen if the next refill is filled too early as a result of the incorrect days supply.



#### QUESTION 4

Which of the following is a common reason for audit recoupment in oral oncolytic billing?

- a. E-script was printed in color
- b. Prescriber's name was abbreviated
- c. Inappropriate quantity for the billed package size
- d. NDC code matched package insert



#### SUMMARY

#### Accurate billing prevents audits

 Ensure claims for oral and IV Part B medications are complete, legible, and aligned with payer policies.

#### Documentation is your defense

 Audit-proof your practice with clear annotations, signature logs, and supporting documentation tied to each claim.

#### Know your modifiers

 $\circ$  Use correct 340B billing modifiers (e.g., JG  $\to$  TB in 2025), and accurately document discarded drugs using JW/JZ.

#### Identify red flags early

 Watch for common audit triggers like mismatched days supply, excessive DAW use, or unclear directions.

#### Fight for every dollar

 Always review audit results and submit reconsiderations or appeals with additional documentation—don't let recoupments go uncontested.

#### QUESTION & ANSWER

## Managed Care Decoded: Winning Strategies for Oncology Billing & Audits

Peter Mertens, MBA, CPhT

Pharmacy Audit and Compliance Manager

Jacqueline Caban, MPA

Manager of Patient Assistance Programs



#### CE CODES

## Managed Care Decoded: Winning Strategies for Oncology Billing & Audits

