Pharmacy Auditing and Dispensing Resource Handout

December 2015

This resource handout is a list of sources that pharmacy health care professionals may find useful with regard to self-audit precautions related to invoice management, controlled substances management, proper billing practices, and proper prescribing practices. In addition, the resource handout provides fraud, waste, and abuse educational and reporting resources. Note that this list is not intended to be exhaustive.

U.S. Department of Health and Human Services

Centers for Medicare & Medicaid Services

- Center for Program Integrity.
  https://www.cms.gov/About-CMS/Components/CPI/Center-for-program-integrity.html
- How to Report Fraud and Suspected Fraud.
  https://www.cms.gov/medicare-medicaid-coordination/fraud-prevention/fraudabuseforconsumers/report_fraud_and_suspected_fraud.html
- Medicaid Program Integrity Education.
  https://www.cms.gov/Medicare-Medicaid-Coordination/Fraud-Prevention/Medicaid-Integrity-Education/edmic-landing.html
- National Training Program Resources.
  https://cms.hhs.gov/Outreach-and-Education/Training/CMSNationalTrainingProgram/index.html
- State Medicaid Contacts Database.
  https://www.cms.gov/apps/contacts/
- State Medicaid Director Letter. (2005, December 29).
  http://www.medicaid.gov/Federal-Policy-Guidance/downloads/SMD122905.pdf
- State Medicaid Director Letter. (1998, November 30).
  http://www.medicaid.gov/Federal-Policy-Guidance/downloads/smd103098.pdf

National Institutes of Health

- U.S. National Library of Medicine. Dailymed.
  http://dailymed.nlm.nih.gov/dailymed/

Office of Inspector General

- Civil Monetary Penalties and Affirmative Exclusions.
  https://oig.hhs.gov/fraud/enforcement/cmp/
- Exclusions Program.
  https://oig.hhs.gov/exclusions/
- List of Excluded Individuals and Entities Downloadable Databases.
  https://oig.hhs.gov/exclusions/exclusions_list.asp
- Health Care Fraud and Abuse Control Program Report.
  https://oig.hhs.gov/reports-and-publications/hcfac/index.asp
- Medicaid Fraud Control Units–MFCUs.
  http://oig.hhs.gov/fraud/medicaid-fraud-control-units-mfcu/index.asp
- OIG Hotline Operations. 1-800-HHS-TIPS (1-800-447-8477).
  https://forms.oig.hhs.gov/hotlineoperations/nothhsemployeeen.aspx
- OIG Hotline Operations. Posters and Flyers.
  https://forms.oig.hhs.gov/hotlineoperations/posteren.aspx

Substance Abuse and Mental Health Services Administration

- Prescription Drug Misuse and Abuse.
  http://www.samhsa.gov/prescription-drug-misuse-abuse

U.S. Food and Drug Administration

- Health Fraud Scams.
  http://www.fda.gov/ForConsumers/ProtectYourself/HealthFraud/default.htm

U.S. Department of Justice

Drug Enforcement Administration

- Disposal Regulations: Registrant Fact Sheet.
  http://www.deadiversion.usdoj.gov/drug_disposal/fact_sheets/disposal_registrant.pdf
- Diversion Field Office Locations.
  http://www.dea.gov/about/Domesticoffices.shtml
- Form DEA-106: Report of Theft or Loss of Controlled Substances.
  https://www.deadiversion.usdoj.gov/webforms/dtlLogin.jsp
- Office of Diversion Control. 1-800-882-9539.
  http://www.deadiversion.usdoj.gov/index.html
- Pharmacist's Manual. (2010).
  http://www.deadiversion.usdoj.gov/pubs/manuals/pharm2/pharm_manual.pdf
- Policy Statement: Dispensing Controlled Substances for the Treatment of Pain. (2006, September 26).
  http://www.deadiversion.usdoj.gov/fed_regs/notices/2006/fr09062.htm

- Report Submission Form for Suspected Unlawful Sales of Pharmaceutical Drugs on the Internet.
  https://www.deadiversion.usdoj.gov/webforms/jsp/umpire/umpireForm.jsp
- RX Abuse Online Reporting: Report Incident. 1-877-RX-Abuse (1-877-792-2873).
  https://www.deadiversion.usdoj.gov/rxaor/spring/main?execution=e2s1

Federal Bureau of Investigation

- Health Care Fraud.
  http://www.fbi.gov/about-us/investigate/white_collar/health-care-fraud
- FBI Tips and Public Leads.
  https://tips.fbi.gov/

Code of Federal Regulations

- Drug Enforcement Administration, Department of Justice. 21 C.F.R. §§ 1300.01-1321.01.
  http://www.ecfr.gov/cgi-bin/text-idx?SID=1cdfaa11801d8ece881d5e58564786dc&tpl=/ecfrbrowse/Title21/21chapterII.tpl
- Program Integrity: Medicaid. 42 C.F.R. §§ 455.1-455.518.
  http://www.ecfr.gov/cgi-bin/text-idx?SID=67ff99793b8a0c463ac1380a5c9f5c76&node=pt42.4.455&rgn=div5

United States Code

- Controlled Substances Act, 21 U.S.C. §§ 801-971.
  http://uscode.house.gov/view.xhtml?path=/prelim@title21/chapter13&edition=prelim
- False Claims, 31 U.S.C. § 3729.
  http://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title31-section3729&num=0&edition=prelim
- False, Fictitious or Fraudulent Claims, 18 U.S.C. § 287.
  http://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title18-section287&num=0&edition=prelim
- Federal Food, Drug, and Cosmetic Act, 21 U.S.C. §§ 301-399.
  http://uscode.house.gov/view.xhtml?path=/prelim@title21/chapter9&edition=prelim
- Payment for Covered Outpatient Drugs. Social Security Act. 42 U.S.C. §§ 1396r-8.
  http://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title42-section1396r-8&num=0&edition=prelim

United States Government

- Office of National Drug Control Policy.
  https://www.whitehousedrugpolicy.gov
- Payment Accuracy.
  https://paymentaccuracy.gov/

Other Resources

- American Drug Utilization Review Society.
  http://www.adurs.com/
- Institute for Safe Medication Practices.
  http://www.ismp.org/
- National Alliance for Model State Drug Laws. (2014, December). Prescription Monitoring Programs—State Law and Policy Profiles.
  http://www.namsdl.org/library/2155A1A5-BAEF-E751-709EAA09D57E8FDD/
- National Alliance for Model State Drug Laws. (2014, December). Status of State Prescription Drug Monitoring Programs (PDMPs).
  http://www.namsdl.org/library/57F45761-F05E-9DFD-025D8B9326350C27/
- National Association of Boards of Pharmacy. State Boards of Pharmacy links.
  http://www.nabp.net/boards-of-pharmacy
- National Association of Boards of Pharmacy. Verified-Accredited Wholesale Distributors.
  http://www.nabp.net/programs/accreditation/vawd
- National Association of Medicaid Directors.
  http://medicaiddirectors.org/
- National Association of Medicaid Fraud Control Units.
  http://www.namfcu.net/
- National Association of State Controlled Substances Authorities. (2015, May 3). Prescription Drug Monitoring Program Contacts.
  http://nascsa.org/nascsaPMP/contactList/NASCSApmpContacts.pdf
- National Community Pharmacists Association. (2012, November 7). Q&A–Strategies for Pharmacy Owners to Reduce Internal Loss of Controlled Substances.
  https://ncpanet.wordpress.com/2012/11/07/qa-strategies-for-pharmacy-owners-to-reduce-internal-loss-of-controlled-substances/
- National Conference of State Legislatures. (2014, July). Recent Medicaid Prescription Drug Laws and Strategies.
  http://www.ncsl.org/research/health/medicaid-pharmaceutical-laws-and-policies.aspx
- National Health Care Anti-Fraud Association.
  http://www.nhcaa.org/
- The Henry J. Kaiser Family Foundation. Medicaid.
  http://kff.org/Medicaid/

To see the electronic version of this resource handout and the other products included in the "Pharmacy Self-Auditing: Control Practices to Improve Medicaid Program Integrity and Quality" Toolkit, visit the Medicaid Program Integrity Education page at https://www.cms.gov/Medicare-Medicaid-Coordination/Fraud-Prevention/Medicaid-Integrity-Education/edmic-landing.html on the CMS website.

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