

## Pharmacy Specific CIA Training

Welcome to the Pharmacy Specific CIA Training. Wal-Mart's policy on the handling of third party, partially-filled prescriptions applies to any persons involved in providing retail prescription services and prescription services to any Federal Health Care Program or private insurance company.

To comply with legal requirements, all Pharmacy Associates must strictly adhere to these procedures. In this module you learn about specific procedures for:

- billing partially-filled, **third party** prescriptions, and
- the process for partially-filled prescriptions for **cash** paying Customers.

***For system instructions on processing partially-filled prescriptions, please refer to your facility's online reference, WIRE, for Partial Fill Procedures.***

First, we should define a partial fill. A partial fill situation occurs when there is not enough inventory to completely fill that prescription and the Customer receives a partial quantity.

There are three basic parts of a partial fill:

1. Original claim submission
2. Initial partial fill, and
3. Final partial fill

The **original claim** is the fill dropped off by the Customer before the partial fill is created. Connexus automatically reverses the original claim from the third party when this partial fill is created.

The **initial partial fill** is a minimum 3-day supply (the default quantity) up to a maximum 7-day supply of medication, which is dispensed to the Customer.

The initial partial fill is dispensed to the third party Patient at no charge and the final partial fill is maintained in a "troubleshoot" status until the Pharmacy receives a sufficient quantity of the medication to fill the remaining amount.

Cash Customers pay a prorated amount based on the quantity dispensed.

When the Pharmacy receives a sufficient quantity of the medication, the final partial fill is released from troubleshoot and placed in a "final fill" status.

Upon completion of the **final partial fill**, the claim with both the initial and final fill is then re-transmitted automatically via Connexus to the third party.

***Cash Customers pay the remaining prorated amount at this time.***

Why do we send information to the third party payor?

- Part of the prescription filling process involves sending prescription information to the third party payor. This information includes eligibility and related data.

***Acceptance by the respective third party is frequently the Pharmacy's notification that the Patient is eligible and the claim is covered by the plan. In addition, most third parties initiate payment based upon this process.***

This is also true in a partial fill situation. Wal-Mart Pharmacy will submit prescription data to ensure Patients are eligible beneficiaries or members and Wal-Mart will be paid for dispensing the medications.

Wal-Mart Pharmacy will automatically credit return the original claim and the original cost amount of prescriptions when less than the full quantity is available. This process will allow Wal-Mart Pharmacy to identify if a Patient is authorized for a specific medication without ultimately charging the third party for the original claim attempts.

This method is also the basis for capturing the cost used to prorate the amount for cash paying Customers.

Wal-Mart shall submit or claim only one dispensing fee from any third party for a partially-filled prescription and collect only one co-payment amount from the Patient. This is done at the time of the final fill.

If Wal-Mart bills a third party for a prescription that is not ultimately delivered to the Patient, in whole or in part, Wal-Mart will reconcile with or credit the third party for the portion of the medication that was not dispensed.

Here is one example of improper billing:

- A Customer received one of two inhalers prescribed by their physician as an initial partial fill.
  - The Pharmacy completed the final fill and the Customer never returned to pick this up.
    - The Pharmacy zero outs the co-pay at the register to receive credit for the initial fill and places the second inhaler back on the shelf.

This is an example of improper billing. Charging a third party for a prescription not ultimately delivered in full to the Patient is a violation.

**Violation** of this policy can result in disciplinary action, up to and including termination.

**Non-compliance** with this policy can also cause significant financial penalties to the Pharmacy and to the Company.

**We will not under any circumstances ultimately charge a Customer or third party for items not dispensed.**

**Direct** any questions and concerns you may have concerning this policy to your supervisor, Compliance Officer, or call the Compliance Hotline.

Now that we understand what a partial fill is and the three parts it involves, let's look at each part and the steps they include.

1. When a prescription is received and there is not enough inventory to fill it, the prescription is processed as a partial fill. The Pharmacy system will reverse the original claim and then splits in two fills...initial fill and final fill.
2. The initial fill, a minimum 3-day supply up to a maximum 7-day supply, is dispensed at no charge to the Customer or to the third party.
3. Information concerning the quantity remaining after the initial fill, is placed automatically in Troubleshoot until the item can be replenished and dispensed later in the final partial fill.
4. Cash paying Customers will pay a prorated amount.

**Remember** we dispense third party initial partial fills at no charge to the Customer (no co-payment is collected) or to the third party.

**Cash** prescriptions are dispensed at a prorated charge to the Customer, based on the day's supply dispensed.

***Verify the security scan tag reads "Initial Partial Fill - No Charge" for third party Customers and a prorated amount appears for cash paying Customers***

There are a few steps to complete when the Customer comes for the prescription.

1. First, scan the prescription using proper TaSCO procedures to show that it is being delivered to the Customer and is leaving the Pharmacy.

2. Second, inform the Customer of the initial partial fill, explaining the quantity or day's supply provided. Keep in mind, we have inconvenienced the Customer by being out of stock. Inform the third party Customer there is NO charge for the initial fill and the Customer will be charged for the entire prescription when they return to obtain the final fill. Explain to cash paying Customers that we are only charging for the quantity dispensed.
3. Third, let the Customer know when the remaining quantity will be available for pick up.
  - If the Customer is a third party Customer, remind them the charge for the total prescription will appear when the prescription's final partial fill is completed.
  - Cash paying Customers pay for the remaining quantity when the final partial fill is completed.

When handling partially filled prescriptions, Associates shall inform Patients that they will receive partial quantity of their prescription. Instruct the Patient of the need to obtain the remainder of their prescription to comply with prescribers care instructions. Claims submission for the partially filled prescription shall be in accordance with policy.

***Associates shall comply with all internal control procedures established to ensure accurate and complete recording of Division and third party transactions.***

After all information about the partial fill has been conveyed to the Customer and the Patient's information updated in the Pharmacy system, there is still two more things the Associate must know:

1. If there is only one prescription which is the partial fill, no further action needs to be taken after TaSCO unless it is a cash paying Customer.
2. If there is, more than one prescription attached with the initial partial fill, offer to do this in the Pharmacy, but **allow the** Customer to shop the rest of the store and also use any register they desire when they check out.

Reminding the Customer to have their prescriptions scanned at any register will help eliminate unnecessary research later in the partial fill process.

***Now you are ready to begin learning about the final partial fill.***

When the inventory is replenished and the remainder of the prescription can be filled, the final partial fill is released from Troubleshoot so the prescription can be completed.

Connexus checks to see if the initial fill was “sold”. If the initial partial fill has been sold, Connexus sends the final fill to be filled. You will need to verify the Customer’s instructions for receiving the remainder of their prescription. If the Customer indicated they would pick up the prescription, notify the Customer by telephone that their prescription is ready. If the Customer indicated they wanted the prescription mailed, send the prescription by mail.

- Note: Ensure that mailing prescriptions is allowed in your state before mailing a prescription to a Patient.

There may be times when the initial partial fill has NOT been sold (meaning scanned out of the pharmacy/register). If this occurs, Connexus sends the prescription to Troubleshoot and prompts you to locate the prescription or confirm that the Customer received the initial partial fill.

First, check the Will Call bin or refrigerator for the prescription. If the prescription is located, credit return the initial fill in Connexus. This adjusts the on-hand quantity and cancels both the initial and final partial fill.

Connexus creates a new fill for the full quantity of the prescription, which is completed following the normal prescription filling process.

So what happens if you cannot locate the prescription? This is a good time to call the Customer and determine if the initial partial fill has been received. If this is the case, and the Customer confirms they received the prescription, mark the initial partial fill as “Sold” in Connexus.

Complete the prescription filling process for the remaining quantity due the Patient for the final partial fill.

***Now let’s say the Customer states they did not receive the prescription. Connexus credit returns the initial partial fill making no change to the on-hands. The partial fill, including both the initial and final, is canceled. The cost of the initial partial fill results in shrink to the Pharmacy. Connexus creates a new fill for the full quantity of the prescription. Complete the new fill, following the normal prescription filling process***

When the final partial fill is completed in Connexus, the prescription claim is transmitted to the third party for the total quantity dispensed for the prescription.

For cash paying Customers Connexus prorates the amount paid, according to the quantity dispensed.

***Under no circumstance should a Customer or third party be charged for a quantity that has not been ultimately dispensed. Doing so is a violation of the law, the Pharmacy Code of***

***Conduct, and Wal-Mart's Corporate Integrity Agreement (CIA). Such conduct also subjects you and Wal-Mart to possible civil and criminal regulatory governmental enforcement actions***

When a Customer does not return for the final fill, credit return the final partial fill.

Customer Service is the most important part of our business at Wal-Mart Stores, Inc. Being in-stock on the items our Customers need and want is vital to providing excellent Customer Service. This is especially true in the Pharmacy.

Our goal is to always be in stock on all medications; however, there will be times when we do not have enough inventory on hand to completely fill a prescription. When this happens, it may be appropriate to partially fill the prescription for the Customer.

The information contained in this module outlines the procedures for tracking and submitting partially-filled third party prescription and processing partially-filled prescriptions for cash paying Customers.

To comply with legal requirements, all Pharmacy Associates must strictly adhere to these procedures. Failure to comply will subject the Associate to disciplinary action.