



March 23, 2020

Re: CVS Caremark Operational Updates

As we continue to monitor PBMs and how they are partnering with specialty pharmacies and continuing to work with specialty pharmacies to ensure patients receive their much needed and life-saving medications, we have received some additional information specific to CVS Caremark ("Caremark") concerning policies put into place during the Covid-19 national emergency.

- Mailing medications. Caremark is allowing pharmacies to ship, mail or delivery necessary prescription medications in order to ensure Caremark members receive their prescription medications in a timely manner. Please remember, applicable laws and rules still apply, including for example the need for a pharmacy to be licensed in the State to which it sends medication.
- Copay collection. All efforts to collect copays should continue as usual. In communications, Caremark is reminding pharmacies that Federal Medicaid law (42 U.S.C. § 1396o(e)) states that no provider participating under the State plan may deny services to an individual on account of such individual's inability to pay the patient amount.
- Refill-Too-Soon edits. If requested by a Caremark member, pharmacies may override the refill-too-soon edit by entering Submission Clarification 13 in NCPDP Field 420-DK and the patient's home zip code in NCPDP Field 325-CP. Caremark requires that member requests should be documented and retained in an easily retrievable format, on either the prescription hardcopy or within the pharmacy software system. If the claim continues to reject after submitting SCC 13, the pharmacy should call the Pharmacy Help Desk number.
- Signature logs. In an effort to ensure social distancing, Caremark is allowing pharmacies to document "COVID" on its signature log with delivery date and delivery time for retail pharmacy patients that choose not to directly sign. For delivered prescriptions, the pharmacy should document delivery by writing "COVID Delivery" when capturing direct signatures is not possible. For delivered prescriptions, pharmacies must maintain the tracking information and a means to tie the impacted signature back to the specific prescription (e.g., Rx# and Date of Fill).

We will continue to update you with information from the PBMs as we learn about more specific protocols/guidance being put into place.