

Pharmacy Auditing and Dispensing Job Aid: Billing Oral Products

Pharmacists and their staff members have a responsibility to ensure patients receive the correct medication in the correct dosage form. The correct billing of selected dosage forms can sometimes be difficult to decipher. A National Council for Prescription Drug Programs (NCPDP) pharmacist explains, “Billing unit errors can have serious consequences when State Medicaid agencies are involved, as underpayment or overpayment of rebates could generate a fraud investigation by the State or by the Centers for Medicare and Medicaid Services (CMS).”[1] The NCPDP billing unit standard (BUS) helps pharmacists and staff members submit accurate claims for pharmaceutical products. NCPDP created the BUS to provide guidance to pharmacy claims software developers and to promote uniformity and consistency across standard billing units.[2] The standards started by NCPDP address billing unit inconsistencies in the health care delivery industry that may result in incorrect reimbursement or difficulties defining what constitutes a billing unit. The standards provide a consistent and well-defined billing unit for use in pharmacy transactions, provide a method to assign a standard billing unit, reduce the time it takes for a pharmacist to accurately bill a prescription and get paid correctly, and provide a standard billing unit for use in the calculation of accurate reimbursement and provides a standard size unit of measure for use in drug utilization review.[3]

The BUS employs only three billing units to describe any and all drug products. These billing units are milliliter, gram, and each.[4] Items billed as “milliliter” include any product measured by liquid volume, such as injectable products of 1 milliliter or greater, reconstitutable non-injectable products at the final volume after reconstitution, and some inhalers. Items billed as “grams” include those measured by weight such as creams or ointments in packages of 1 gram or greater, and some inhalers. Items billed as “each” include tablets, capsules, suppositories, transdermal patches, non-filled syringes, tapes, blister packs, oral powder packets, powder-filled vials for injection, unit-of-use packages with less than 1 milliliter or gram, and kits.[5]

In addition to selecting the correct billing unit, calculation of the correct days’ supply can also be confusing. The dose of a drug is the quantitative amount of drug for administration or consumption that will produce the desired effect. If the calculated quantity does not appear on the prescription blank, the pharmacist or staff member must multiply the number of doses per day by the number of days treatment is required to calculate the quantity to be dispensed. To calculate the days’ supply, the pharmacist or staff member should divide the given or calculated quantity by the number of doses per day. However, days’ supply calculation is not always easy or intuitive when the pharmacist or staff member must consider kits, complex dosing regimens, and atypical dosing regimens. Arriving at the correct days’ supply is as important as using the correct billing unit standard when billing Medicaid. An incorrect days’ supply calculation can cause the beneficiary to receive the wrong amount of medication, can cause claim rejections, or may raise audit red flags.[6]

Dosage Calculations for Oral Products

Follow these steps to calculate the correct days’ supply based on injectable dosage forms.

Divide the number of doses dispensed (capsules, tablets, or milliliters) by the number of daily doses. For example, 30 doses divided by 3 doses per day equal 10 days’ supply. When calculating pro re nata (prn) or “as-needed” dosing, use the maximum allowable daily dose as the number of daily doses. For example, if the drug is prescribed every 4 to 6 hours as needed, with a quantity of 42 doses, calculate the days’ supply by dividing 42 doses by 6 doses per day to determine a 7 days’ supply. If the product is not dosed daily, multiply the number of doses dispensed by the dosing interval. For example, 4 doses multiplied by 7 days per dose equals 28 days’ supply. When dispensing a single dose, determine the days’ supply by considering only the dosing interval. For example, if one dose of ibandronate 150 milligrams is dispensed, the correct days’ supply is 30 based on the approved dosing interval of 30 days for ibandronate 150 milligrams.[7] For inconsistent dosing intervals, calculate the days’ supply by considering the total time elapsed for beneficiary to use the entire amount of product dispensed. For example, if a drug is dosed once daily on days 0, 7, and 21, the correct days’ supply would be 21. For reconstituted non-injectable products, calculate the days’ supply using the final volume after reconstitution in milliliters, considering stability and beyond-use dates after reconstitution.

Oral Products Billing Unit Standard and Days' Supply Matrix

Please review the following tables to help identify the correct BUS and the correct days' supply for oral dosage forms commonly associated with billing errors.

Table 1. Anti-Migraine Agents

Brand Name of Drug	Generic Name of Drug	Dosage Form	Billing Errors	National Drug Code	Package Size	Common Incorrect Billing Quantity	Common Incorrect Billing Units	Common Incorrect Days' Supply	Correctly Billed Quantity	Correctly Billed Units	Correctly Billed Days' Supply	Labeled Indications & Dose
Relpax	Eletriptan	Oral tablet	Incorrect days' supply.	00049233045	6 tablets	6	Tablets	6 days	6	Each (tablet)	30 days	Acute migraine with or without aura: initial dose 20 to 40 mg. If migraine has not resolved by 2 hours after taking Relpax or returns after transient improvement, a second dose may be administered at least 2 hours after the first dose. Maximum daily dose should not exceed 80 mg. Safety of treating more than 3 headaches in a 30-day period has not been established.
Relpax[8]	Eletriptan	Oral tablet	Incorrect days' supply.	00049234005	12 tablets	6	Tablets	6 days	6	Each (tablet)	30 days	Acute migraine with or without aura: initial dose 20 to 40 mg. If migraine has not resolved by 2 hours after taking Relpax or returns after transient improvement, a second dose may be administered at least 2 hours after the first dose. Maximum daily dose should not exceed 80 mg. Safety of treating more than 3 headaches in a 30-day period has not been established.
Maxalt	Rizatriptan	Oral tablet	Incorrect days' supply.	00006026618	18 tablets	9	Tablets	9 days	9	Each (tablet)	30 days	Acute migraine with or without aura: starting dose: 5 mg or 10 mg. May repeat dose after 2 hours if needed; not to exceed 30 mg in any 24-hour period. Safety of treating more than 4 headaches in a 30-day period has not been established.
Maxalt	Rizatriptan	Oral tablet	Incorrect days' supply.	00006026718	18 tablets	9	Tablets	9 days	9	Each (tablet)	30 days	Acute migraine with or without aura: starting dose: 5 mg or 10 mg. May repeat dose after 2 hours if needed; not to exceed 30 mg in any 24-hour period. Safety of treating more than 4 headaches in a 30-day period has not been established.
Maxalt	Rizatriptan	Disintegrating tablet	Incorrect days' supply.	00006380018	18 tablets	9	Tablets	9 days	9	Each (tablet)	30 days	Acute migraine with or without aura: starting dose: 5 mg or 10 mg. May repeat dose after 2 hours if needed; not to exceed 30 mg in any 24-hour period. Safety of treating more than 4 headaches in a 30-day period has not been established.
Maxalt[9]	Rizatriptan	Disintegrating tablet	Incorrect days' supply.	00006380118	18 tablets	9	Tablets	9 days	9	Each (tablet)	30 days	Acute migraine with or without aura: starting dose: 5 mg or 10 mg. May repeat dose after 2 hours if needed; not to exceed 30 mg in any 24-hour period. Safety of treating more than 4 headaches in a 30-day period has not been established.

Table 1. Anti-Migraine Agents (cont.)

Brand Name of Drug	Generic Name of Drug	Dosage Form	Billing Errors	National Drug Code	Package Size	Common Incorrect Billing Quantity	Common Incorrect Billing Units	Common Incorrect Days' Supply	Correctly Billed Quantity	Correctly Billed Units	Correctly Billed Days' Supply	Labeled Indications & Dose
Imitrex	Sumatriptan	Oral tablet	Incorrect days' supply.	00173073701	9 tablets	9	Tablets	9 days	9	Each (tablet)	30 days	Migraine: single dose of 25 mg, 50 mg, or 100 mg tablet. A second dose should only be considered if some response to the first dose was observed. Separate doses by at least 2 hours. Maximum dose in a 24-hour period: 200 mg. Safety of treating more than 4 headaches in a 30-day period has not been established.
Imitrex	Sumatriptan	Oral tablet	Incorrect days' supply.	00173073500	9 tablets	9	Tablets	9 days	9	Each (tablet)	30 days	Migraine: single dose of 25 mg, 50 mg, or 100 mg tablet. A second dose should only be considered if some response to the first dose was observed. Separate doses by at least 2 hours. Maximum dose in a 24-hour period: 200 mg. Safety of treating more than 4 headaches in a 30-day period has not been established.
Imitrex[10]	Sumatriptan	Oral tablet	Incorrect days' supply.	00173073601	9 tablets	9	Tablets	9 days	9	Each (tablet)	30 days	Migraine: single dose of 25 mg, 50 mg, or 100 mg tablet. A second dose should only be considered if some response to the first dose was observed. Separate doses by at least 2 hours. Maximum dose in a 24-hour period: 200 mg. Safety of treating more than 4 headaches in a 30-day period has not been established.
Zomig	Zolmitriptan	Oral tablet	Incorrect days' supply.	64896067151	6 tablets	6	Tablets	6 days	6	Each (tablet)	30 days	Acute migraine with or without aura: starting dose: 1.25 mg or 2.5 mg. Maximum single dose: 5 mg. May repeat dose after 2 hours if needed; not to exceed 10 mg in any 24-hour period. Safety of treating more than 3 headaches in a 30-day period has not been established.
Zomig	Zolmitriptan	Oral tablet	Incorrect days' supply.	64896067250	3 tablets	6	Tablets	6 days	6	Each (tablet)	30 days	Acute migraine with or without aura: starting dose: 1.25 mg or 2.5 mg. Maximum single dose: 5 mg. May repeat dose after 2 hours if needed; not to exceed 10 mg in any 24-hour period. Safety of treating more than 3 headaches in a 30-day period has not been established.
Zomig	Zolmitriptan	Disintegrating tablet	Incorrect days' supply.	64896069151	6 tablets	6	Tablets	6 days	6	Each (tablet)	30 days	Acute migraine with or without aura: starting dose: 1.25 mg or 2.5 mg. Maximum single dose: 5 mg. May repeat dose after 2 hours if needed; not to exceed 10 mg in any 24-hour period. Safety of treating more than 3 headaches in a 30-day period has not been established.
Zomig[11]	Zolmitriptan	Disintegrating tablet	Incorrect days' supply.	64896069250	3 tablets	6	Tablets	6 days	6	Each (tablet)	30 days	Acute migraine with or without aura: starting dose: 1.25 mg or 2.5 mg. Maximum single dose: 5 mg. May repeat dose after 2 hours if needed; not to exceed 10 mg in any 24-hour period. Safety of treating more than 3 headaches in a 30-day period has not been established.

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Table 2. Miscellaneous Oral Products

Brand Name of Drug	Generic Name of Drug	Dosage Form	Billing Errors	National Drug Code	Package Size	Common Incorrect Billing Quantity	Common Incorrect Billing Units	Common Incorrect Days' Supply	Correctly Billed Quantity	Correctly Billed Units	Correctly Billed Days' Supply	Labeled Indications & Dose
Zmax[12]	Azithromycin	Extended release suspension pack	Excessive quantity when billed for number of milliliters instead of packs.	00069417034	2 g per 75 ml	75	ml	1 day	1	Each (oral powder packet)	1 day	Mild to moderate acute bacterial sinusitis (adults): 2 g as a single dose. Community-acquired pneumonia (adults): 2 g as a single dose. Community-acquired pneumonia (children 6 months and older): 60 mg/kg as a single dose up to a maximum of 2 g.
Dostinex generic NDC	Cabergoline[13]	Oral tablet	Incorrect days' supply.	00093542088	8 tablets	8	Tablets	8 days	8	Each (tablet)	28 days	Hyperprolactinemic disorders: 0.25 mg to 1 mg twice a week.
Prozac[14]	Fluoxetine	Enteric coated capsule	Incorrect days' supply.	00002300475	Fluoxetine 90 mg - 4 capsules	4	Capsules	4 days	4	Each (capsule)	28 days	Major depressive disorder: 90 mg once weekly. Initiate 7 days after the last daily dose of 20 mg tablets.
Sporanox Pulsepak[15]	Itraconazole	Oral capsule	Incorrect days' supply.	50458029028	4 capsules per pack x 7 packs per box	28	Capsules	7 days	28	Each (capsule)	28 days	Onychomycosis (fingernails only): 2 treatment pulses, each consisting of 200 mg (2 capsules) twice daily for 1 week. The pulses are separated by a 3-week period without treatment.
Lariam generic NDC	Mefloquine[16]	Oral tablet	Incorrect days' supply.	00054002511	25 tablets per bottle	4	Tablets	4 days	4	Each (tablet)	28 days	Acute malaria infections: five 250 mg tablets (1250 mg) given as a single oral dose. Prevention of malaria: one 250 mg tablet given orally once every 7 days beginning 1 week before arrival in an endemic area. Subsequent weekly doses should be taken regularly on the same day of each week and continued for 4 additional weeks after leaving endemic area.

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Table 3. Multi-Drug/Multi-Month Packs

Brand Name of Drug	Generic Name of Drug	Dosage Form	Billing Errors	National Drug Code	Package Size	Common Incorrect Billing Quantity	Common Incorrect Billing Units	Common Incorrect Days' Supply	Correctly Billed Quantity	Correctly Billed Units	Correctly Billed Days' Supply	Labeled Indications & Dose
Introvale[17]	Ethinyl estradiol/levonorgestrel	Oral tablet pack	Incorrect days' supply.	00781558436	91 tablets per pack	91	Tablets	30 days	91	Each (tablet)	91 days	Prevention of pregnancy: 1 active tablet daily for 84 consecutive days, followed by 7 days of inert tablets.
Loseasonique[18]	Ethinyl estradiol/levonorgestrel	Oral tablet pack	Incorrect days' supply.	51285009287	91 tablets per pack	91	Tablets	30 days	91	Each (tablet)	91 days	Prevention of pregnancy: 1 active tablet daily for 84 consecutive days, followed by 7 days of inert tablets.
Quasense[19]	Ethinyl estradiol/levonorgestrel	Oral tablet pack	Incorrect days' supply.	52544096691	91 tablets per pack	91	Tablets	30 days	91	Each (tablet)	91 days	Prevention of pregnancy: 1 active tablet daily for 84 consecutive days, followed by 7 days of inert tablets.
Quartette[20]	Ethinyl estradiol/levonorgestrel	Oral tablet pack	Incorrect days' supply.	51285008787	91 tablets per pack	91	Tablets	30 days	91	Each (tablet)	91 days	Prevention of pregnancy: 1 active tablet daily for 91 consecutive days.

Table 3. Multi-Drug/Multi-Month Packs (cont.)

Brand Name of Drug	Generic Name of Drug	Dosage Form	Billing Errors	National Drug Code	Package Size	Common Incorrect Billing Quantity	Common Incorrect Billing Units	Common Incorrect Days' Supply	Correctly Billed Quantity	Correctly Billed Units	Correctly Billed Days' Supply	Labeled Indications & Dose
Seasonique[21]	Ethinyl estradiol/levonorgestrel	Oral tablet pack	Incorrect days' supply.	51285043165	91 tablets per pack	91	Tablets	30 days	91	Each (tablet)	91 days	Prevention of pregnancy: 1 active tablet daily for 91 consecutive days.
Prevpac[22]	Amoxicillin/clarithromycin/lansoprazole	Oral tablet	Insufficient quantity when billed for number of doses instead of tablets.	64764070201	112 tablets per pack	14	Doses	14 days	112	Each (tablet)	14 days	Helicobacter pylori eradication to reduce the risk of duodenal ulcer recurrence: one 30 mg lansoprazole (Prevacid®) capsule, 1 g amoxicillin (two 500 mg capsules), and one 500 mg clarithromycin tablet administered together twice daily (morning and evening) for 10 or 14 days.
Fosamax[23]	Alendronate	Oral tablet	Incorrect days' supply.	00006003144	4 tablets	4	Tablets	4 days	4	Each (tablet)	28 days	Osteoporosis in postmenopausal women and in men: 10 mg daily or 70 mg (tablet or oral solution) once weekly. Prevention of osteoporosis in postmenopausal women: 5 mg daily or 35 mg once weekly. Glucocorticoid-induced osteoporosis: 5 mg daily; or 10 mg daily in postmenopausal women not receiving estrogen. Paget's disease: 40 mg daily for 6 months.
Fosamax Plus D	Alendronate/cholecalciferol	Oral tablet	Incorrect days' supply.	00006071044	5 tablets	4	Tablets	4 days	4	Each (tablet)	28 days	Osteoporosis in postmenopausal women and to increase bone mass in men with osteoporosis: 70 mg alendronate/2800 international units vitamin D3 or 70 mg alendronate/5600 international units vitamin D3 tablet once weekly.
Fosamax Plus D[24]	Alendronate/cholecalciferol	Oral tablet	Incorrect days' supply.	00006027044	6 tablets	4	Tablets	4 days	4	Each (tablet)	28 days	Osteoporosis in postmenopausal women and to increase bone mass in men with osteoporosis: 70 mg alendronate/2800 international units vitamin D3 or 70 mg alendronate/5600 international units vitamin D3 tablet once weekly.

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Table 4. Osteoporosis Agents

Brand Name of Drug	Generic Name of Drug	Dosage Form	Billing Errors	National Drug Code	Package Size	Common Incorrect Billing Quantity	Common Incorrect Billing Units	Common Incorrect Days' Supply	Correctly Billed Quantity	Correctly Billed Units	Correctly Billed Days' Supply	Labeled Indications & Dose
Boniva[25]	Ibandronate	Oral tablet	Incorrect days' supply.	00004018683	3 tablets	1	Tablet	1 day	1	Each (tablet)	28 days	Treatment and prevention of postmenopausal osteoporosis: 150 mg tablet once monthly.

Table 4. Osteoporosis Agents (cont.)

Brand Name of Drug	Generic Name of Drug	Dosage Form	Billing Errors	National Drug Code	Package Size	Common Incorrect Billing Quantity	Common Incorrect Billing Units	Common Incorrect Days' Supply	Correctly Billed Quantity	Correctly Billed Units	Correctly Billed Days' Supply	Labeled Indications & Dose
Actonel	Risedronate	Oral tablet	Incorrect days' supply.	00430047801	1 tablet	4	Tablets	4 days	4	Each (tablet)	28 days	Postmenopausal osteoporosis: 5 mg daily, 35 mg once a week, 75 mg 2 consecutive days each month, or 150 mg once-a-month. Prevention of postmenopausal osteoporosis: 5 mg daily or 35 mg once a week. Men with osteoporosis: 35 mg once a week. Glucocorticoid-induced osteoporosis: 5 mg daily. Paget's disease: 30 mg daily for 2 months.
Actonel[26]	Risedronate	Oral tablet	Incorrect days' supply.	00430047203	4 tablets	4	Tablets	4 days	4	Each (tablet)	28 days	Postmenopausal osteoporosis: 5 mg daily, 35 mg once a week, 75 mg 2 consecutive days each month, or 150 mg once-a-month. Prevention of postmenopausal osteoporosis: 5 mg daily or 35 mg once a week. Men with osteoporosis: 35 mg once a week. Glucocorticoid-induced osteoporosis: 5 mg daily. Paget's disease: 30 mg daily for 2 months.
Atelvia[27]	Risedronate	Oral tablet	Incorrect days' supply.	00430097903	4 tablets	4	Tablets	4 days	4	Each (tablet)	28 days	Postmenopausal osteoporosis: one 35 mg delayed-release tablet once a week.

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