

Pharmacy Auditing and Dispensing Job Aid: Billing Other Dosage Forms

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 within 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 provides a standard billing unit for use in 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 BUS 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

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

Inhaled Products

To calculate the days’ supply for inhalers, first calculate the total number of actuations or doses to be dispensed by multiplying the number of actuations or doses per inhaler by the number of inhalers to be dispensed. Then, divide the total number of actuations or doses to be dispensed by the number of actuations or doses required daily. Keep in mind, the BUS for inhalers will be the metric decimal quantity unit of measure labeled on the inhaler, which may be milliliter or grams. When both milliliters and grams are supplied on the package label, use the first measurement unit listed. When dispensing a unit dose product of less than 1 milliliter for administration via nebulizer, consider each unit dose “each.” Calculate the days’ supply by dividing the number of unit doses by the number of doses prescribed per day.[7]

Ophthalmic and Otic Products

Using a conversion factor of 20 drops per milliliter, calculate the days' supply by dividing the total number of drops dispensed by the number of drops required for each day's dose. For example, consider an ophthalmic product to be dosed one drop in each eye twice daily and dispensed in a 2.5 milliliter bottle. To calculate the total number of drops dispensed, multiply 2.5 milliliters by 20 drops per milliliter to find 50 drops per bottle. Divide 50 drops per bottle by 4 drops per day to find the correct days' supply of 12.5.

Vaginal Products

To calculate the days' supply for vaginal products, consider the dosing interval between the insertion of the vaginal product and reinsertion of a new vaginal product. Take into consideration the number of days that must elapse before insertion of the new product. For example, if the beneficiary inserts a vaginal ring on day 1, removes it on day 21, observes a 7 day drug free interval, and reinserts on day 29, the correct days' supply is 28. In addition, if the vaginal product has an extended dosing interval, such as every 90 days, the correct days' supply is 90. If the labeled dosing and administration of the vaginal product differs for initiation dosing and maintenance dosing, calculate the days' supply for initiation separately from maintenance. For example, for beneficiaries initiating film-coated vaginal estradiol tables (Vagifem®), the correct days' supply for the 18 tablet box is 28 days, based on the initiation dose of 1 tablet daily for 2 weeks, then twice weekly for 2 weeks. However, refills of this package size are not appropriate because the correct days' supply for maintenance dosing for the 8 tablet box is 28 days based on twice weekly dosing.[8]

Topical Products

Consider the frequency and size of area to be treated. Generally, the smallest package size available should be sufficient to treat for Food and Drug Administration labeled indications. Also consider the "Rule of Hand" – each gram will usually cover an area represented by four handprints.[9] For complex chronic conditions and those that involve frequent or large treatment areas, work with the prescriber to determine the maximum amount of topical product the beneficiary may need. Document all calculations and prescriber clarification on the prescription blank. When dispensing a unit dose product of less than 1 gram per unit dose, consider each unit dose "each." Calculate the days' supply by dividing the number of unit doses by the number of doses prescribed per day.[10]

Other Dosage Forms Billing Unit Standard and Days' Supply Matrix

Please review the following tables to help identify the correct billing unit standard and the correct days' supply for inhaled, ophthalmic, vaginal and topical dosage forms commonly associated with billing errors.

Table 1. Inhaled 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 |
|--------------------|---------------------------|----------------------|--|--------------------|---|-----------------------------------|--------------------------------|-------------------------------|---------------------------|----------------------------------|-------------------------------|---|
| Combivent[11] | Albuterol/ ipratropium | Metered dose inhaler | Excessive quantity when billed for number of doses instead of grams. | 00597002402 | 20 mcg/100 mcg per actuation x 120 doses | 120 | Doses | 30 days | 4 | g | 30 days | Chronic obstructive pulmonary disease: 1 inhalation 4 times a day, not to exceed 6 inhalations in 24 hours. |
| Pulmicort | Budesonide | Dry powder inhaler | Excessive quantity when billed for number of doses instead of by the canister. | 00186091706 | 90 mcg per dose x 60 doses per canister | 60 | Doses | 30 days | 1 | Each (canister of less than 1 g) | 30 days | Asthma: adult starting dose is 360 mcg (two 180 mcg inhalations) twice daily. In some adult patients, a starting dose of 180 mcg (1 inhalation) twice daily may be adequate. The maximum dosage should not exceed 720 mcg (four 180 mcg inhalations) twice daily. Asthma pediatric patients six years of age or older: starting dose is 180 mcg (1 inhalation) twice daily. In some pediatric patients, a starting dose of 360 mcg (two 180 mcg inhalations) may be appropriate. The maximum dosage should not exceed 360 mcg (two 180 mcg inhalations) twice daily. |
| Pulmicort[12] | Budesonide | Dry powder inhaler | Excessive quantity when billed for number of doses instead of by the canister. | 00186091612 | 180 mcg per dose x 120 doses per canister | 120 | Doses | 30 days | 1 | Each (canister of less than 1 g) | 30 days | Asthma: adult starting dose is 360 mcg (two 180 mcg inhalations) twice daily. In some adult patients, a starting dose of 180 mcg (1 inhalation) twice daily may be adequate. The maximum dosage should not exceed 720 mcg (four 180 mcg inhalations) twice daily. Asthma pediatric patients six years of age or older: starting dose is 180 mcg (1 inhalation) twice daily. In some pediatric patients, a starting dose of 360 mcg (two 180 mcg inhalations) may be appropriate. The maximum dosage should not exceed 360 mcg (two 180 mcg inhalations) twice daily. |
| DDAVP | Desmopressin | Nasal spray | Excessive quantity when billed for number of sprays instead of milliliters. | 00075245201 | 10 mcg per 0.1 ml spray x 50 sprays per 5 ml bottle | 120 | Sprays | 30 days | 15 | ml | 30 days | Central cranial diabetes insipidus: 0.1 to 0.4 ml daily, either as a single dose or divided into 2 or 3 doses. |

Table 1. Inhaled Products (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 |
|--------------------|----------------------|----------------------|---|--------------------|---|-----------------------------------|--------------------------------|-------------------------------|---------------------------|------------------------|-------------------------------|---|
| DDAVP[13] | Desmopressin | Nasal solution | Excessive quantity when billed for number of doses instead of milliliters. | 00075245001 | 0.1 mg/ml - 0.05 to 0.2 ml per dose; 2.5 ml per bottle | 60 | Doses | 30 days | 12.5 | ml | 30 days | Central cranial diabetes insipidus: 0.1 to 0.4 ml daily, either as a single dose or divided into 2 or 3 doses. |
| Stimate[14] | Desmopressin | Nasal spray | Excessive quantity when billed for number of sprays instead of milliliters. | 00053687100 | 150 mcg per 0.1 ml spray x 25 sprays per 2.5 ml bottle | 25 | Sprays | 25 days | 5 | ml | 25 days | Hemophilia A and mild to moderate classic von Willebrand's disease (type i) with factor viii levels greater than 5%: 1 spray per nostril to provide a total dose of 300 mcg. In patients weighing less than 50 kg: administer 150 mcg as a single spray. Recommended dosage is 150 to 300 mcg for one dose prior to the scheduled procedure, usually no more than every 48 hours. |
| Atrovent[15] | Ipratropium | Metered dose inhaler | Excessive quantity when billed for number of doses instead of grams. | 00597008717 | 17 mcg per inhalation x 200 doses | 200 | Doses | 17 days | 12.9 | g | 17 days | Chronic obstructive pulmonary disease: 2 inhalations 4 times a day, not to exceed 12 inhalations in 24 hours. |
| Asmanex | Mometasone furoate | Dry powder inhaler | Excessive quantity when billed for number of doses instead of grams. | 00085146102 | 110 mcg container delivers 100mcg per inhalation x 30 doses | 30 | Actuations | 30 days | 0.135 | g | 30 days | Asthma: patients ≥12 years who received bronchodilators alone: 220 mcg once daily in the evening; patients ≥12 years who received inhaled corticosteroids: 220 mcg once daily in the evening; patients ≥12 years who received oral corticosteroids: 440 mcg twice daily; or children 4-11 years of age: 110 mcg once daily in the evening. |
| Asmanex | Mometasone furoate | Dry powder inhaler | Excessive quantity when billed for number of doses instead of grams. | 00085134101 | 220 mcg container delivers 200 mcg per inhalation x 120 doses | 120 | Actuations | 30 days | 0.24 | g | 30 days | Asthma: patients ≥12 years who received bronchodilators alone: 220 mcg once daily in the evening; patients ≥12 years who received inhaled corticosteroids: 220 mcg once daily in the evening; patients ≥12 years who received oral corticosteroids: 440 mcg twice daily; or children 4-11 years of age: 110 mcg once daily in the evening. |
| Asmanex | Mometasone furoate | Dry powder inhaler | Excessive quantity when billed for number of doses instead of grams. | 00085134107 | 220 mcg container delivers 200 mcg per inhalation x 30 doses | 30 | Actuations | 30 days | 0.135 | g | 30 days | Asthma: patients ≥12 years who received bronchodilators alone: 220 mcg once daily in the evening; patients ≥12 years who received inhaled corticosteroids: 220 mcg once daily in the evening; patients ≥12 years who received oral corticosteroids: 440 mcg twice daily; or children 4-11 years of age: 110 mcg once daily in the evening. |

Table 1. Inhaled Products (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 |
|--------------------|----------------------|--------------------|---|--------------------|--|-----------------------------------|--------------------------------|-------------------------------|---------------------------|------------------------|-------------------------------|--|
| Asmanex[16] | Mometasone furoate | Dry powder inhaler | Excessive quantity when billed for number of doses instead of grams. | 00085134102 | 220 mcg container delivers 200 mcg per inhalation x 60 doses | 60 | Actuations | 30 days | 0.24 | g | 30 days | Asthma: patients ≥12 years who received bronchodilators alone: 220 mcg once daily in the evening; patients ≥12 years who received inhaled corticosteroids: 220 mcg once daily in the evening; patients ≥12 years who received oral corticosteroids: 440 mcg twice daily; or children 4-11 years of age: 110 mcg once daily in the evening. |
| Tobi[17] | Tobramycin | Inhalant solution | Insufficient quantity when billed for number of ampules instead of milliliters. | 00078049471 | 60 mg/ml - 5 ml per ampule x 56 ampules per carton | 56 | Ampules | 28 days | 280 | ml | 28 days | Management of cystic fibrosis patients with pseudomonas aeruginosa: 300 mg ampule twice daily for 28 days. |

g = grams mcg = kilograms mg = milligram(s) ml = milliliter(s)

Table 2. Ophthalmic 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 |
|--------------------|----------------------|-----------------------|---|--------------------|---|-----------------------------------|--------------------------------|-------------------------------|---------------------------|---|-------------------------------|---|
| Restasis | Cyclosporine | Ophthalmic suspension | Excessive quantity when billed for four vials per day instead of two. | 00023916330 | 0.5 mg/ml x 0.4 ml vials x 30 vials per tray | 120 | Vials | 30 days | 60 | Each (unit of use vial of less than 1 ml) | 30 days | Increase tear production in patients whose tear production is presumed to be suppressed due to ocular inflammation associated with keratoconjunctivitis sicca: instill one drop twice a day in each affected eye. Discard vial immediately after use. |
| Restasis[18] | Cyclosporine | Ophthalmic suspension | Excessive quantity when billed for four vials per day instead of two. | 00023916360 | 0.5 mg/ml x 0.4 ml vials x 60 vials per tray | 120 | Vials | 30 days | 60 | Each (unit of use vial of less than 1 ml) | 30 days | Increase tear production in patients whose tear production is presumed to be suppressed due to ocular inflammation associated with keratoconjunctivitis sicca: instill one drop twice a day in each affected eye. Discard vial immediately after use. |
| Zioptan[19] | Tafluprost | Ophthalmic solution | Excessive quantity when billed for number of doses instead of vials. | 17478060930 | 0.015 mg/ml x 0.3 ml vials x 30 vials per container | 60 | Vials | 30 days | 30 | Each (unit of use vial of less than 1 ml) | 30 days | Reduction of elevated intraocular pressure in patients with open-angle glaucoma or ocular hypertension: one drop in the affected eye(s) once daily in the evening. |

mg = milligram(s) ml = milliliter(s)

Table 3. Topical 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 |
|--------------------|----------------------|-------------------|-------------------------|--------------------|---------------------------|-----------------------------------|--------------------------------|-------------------------------|---------------------------|--------------------------|-------------------------------|---|
| Catapres-TTS | Clonidine | Transdermal patch | Incorrect days' supply. | 00597003134 | 0.00417 mg/hr - 4 patches | 4 | Patches | 4 days | 4 | Each (transdermal patch) | 28 days | Hypertension: 0.1 to 0.3 mg per day via transdermal therapeutic system applied once every 7 days. |
| Catapres-TTS | Clonidine | Transdermal patch | Incorrect days' supply. | 00597003234 | 0.00833 mg/hr - 4 patches | 4 | Patches | 4 days | 4 | Each (transdermal patch) | 28 days | Hypertension: 0.1 to 0.3 mg per day via transdermal therapeutic system applied once every 7 days. |
| Catapres-TTS[20] | Clonidine | Transdermal patch | Incorrect days' supply. | 00597003334 | 0.0125 mg/hr - 4 patches | 4 | Patches | 4 days | 4 | Each (transdermal patch) | 28 days | Hypertension: 0.1 to 0.3 mg per day via transdermal therapeutic system applied once every 7 days. |
| Alora | Estradiol | Transdermal patch | Incorrect days' supply. | 52544088408 | 0.00104 mg/hr - 8 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms associated with menopause, moderate to severe symptoms of vulvar and vaginal atrophy associated with menopause, hypoestrogenism due to hypogonadism, castration or primary ovarian failure, and prevention of postmenopausal osteoporosis: 0.05 mg/day applied to the skin twice weekly. |
| Alora | Estradiol | Transdermal patch | Incorrect days' supply. | 52544047108 | 0.00208 mg/hr - 8 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms associated with menopause, moderate to severe symptoms of vulvar and vaginal atrophy associated with menopause, hypoestrogenism due to hypogonadism, castration or primary ovarian failure, and prevention of postmenopausal osteoporosis: 0.05 mg/day applied to the skin twice weekly. |
| Alora | Estradiol | Transdermal patch | Incorrect days' supply. | 52544047208 | 0.00313 mg/hr - 8 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms associated with menopause, moderate to severe symptoms of vulvar and vaginal atrophy associated with menopause, hypoestrogenism due to hypogonadism, castration or primary ovarian failure, and prevention of postmenopausal osteoporosis: 0.05 mg/day applied to the skin twice weekly. |
| Alora[21] | Estradiol | Transdermal patch | Incorrect days' supply. | 52544047308 | 0.00417 mg/hr - 8 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms associated with menopause, moderate to severe symptoms of vulvar and vaginal atrophy associated with menopause, hypoestrogenism due to hypogonadism, castration or primary ovarian failure, and prevention of postmenopausal osteoporosis: 0.05 mg/day applied to the skin twice weekly. |
| Climara | Estradiol | Transdermal patch | Incorrect days' supply. | 50419045404 | 0.00104 mg/hr - 4 patches | 4 | Patches | 4 days | 4 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause; moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, or hypoestrogenism due to hypogonadism, castration or primary ovarian failure; or prevention of postmenopausal osteoporosis: 0.025 mg to 0.1 mg per day via transdermal therapeutic system applied once every 7 days. |

Table 3. Topical Products (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 |
|--------------------|--------------------------|-------------------|-------------------------|--------------------|-----------------------------------|-----------------------------------|--------------------------------|-------------------------------|---------------------------|--------------------------|-------------------------------|---|
| Climara | Estradiol | Transdermal patch | Incorrect days' supply. | 50419045604 | 0.00156 mg/hr - 4 patches | 4 | Patches | 4 days | 4 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause; moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, or hypoestrogenism due to hypogonadism, castration or primary ovarian failure; or prevention of postmenopausal osteoporosis: 0.025 mg to 0.1 mg per day via transdermal therapeutic system applied once every 7 days. |
| Climara | Estradiol | Transdermal patch | Incorrect days' supply. | 50419045104 | 0.00208 mg/hr - 4 patches | 4 | Patches | 4 days | 4 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause; moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, or hypoestrogenism due to hypogonadism, castration or primary ovarian failure; or prevention of postmenopausal osteoporosis: 0.025 mg to 0.1 mg per day via transdermal therapeutic system applied once every 7 days. |
| Climara | Estradiol | Transdermal patch | Incorrect days' supply. | 50419045904 | 0.0025 mg/hr - 4 patches | 4 | Patches | 4 days | 4 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause; moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, or hypoestrogenism due to hypogonadism, castration or primary ovarian failure; or prevention of postmenopausal osteoporosis: 0.025 mg to 0.1 mg per day via transdermal therapeutic system applied once every 7 days. |
| Climara | Estradiol | Transdermal patch | Incorrect days' supply. | 50419045304 | 0.00312 mg/hr - 4 patches | 4 | Patches | 4 days | 4 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause; moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, or hypoestrogenism due to hypogonadism, castration or primary ovarian failure; or prevention of postmenopausal osteoporosis: 0.025 mg to 0.1 mg per day via transdermal therapeutic system applied once every 7 days. |
| Climara[22] | Estradiol | Transdermal patch | Incorrect days' supply. | 50419045204 | 0.00417 mg/hr - 4 patches | 4 | Patches | 4 days | 4 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause; moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, or hypoestrogenism due to hypogonadism, castration or primary ovarian failure; or prevention of postmenopausal osteoporosis: 0.025 mg to 0.1 mg per day via transdermal therapeutic system applied once every 7 days. |
| Climara Pro[23] | Estradiol/levonorgestrel | Transdermal patch | Incorrect days' supply. | 50419049104 | 0.00188/0.00625 mg/hr - 4 patches | 4 | Patches | 4 days | 4 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause and prevention of postmenopausal osteoporosis: 0.045 mg/day estradiol and 0.015 mg/day levonorgestrel per day via transdermal therapeutic system applied once every 7 days. |

Table 3. Topical Products (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 |
|--------------------|----------------------|-------------------|-------------------------|--------------------|----------------------------|-----------------------------------|--------------------------------|-------------------------------|---------------------------|--------------------------|-------------------------------|--|
| Minivelle | Estradiol | Transdermal patch | Incorrect day' supply. | 68968662508 | 0.00104 mg/hr - 8 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause and prevention of postmenopausal osteoporosis: apply one 0.025 mg/day to 0.1 mg/day transdermal patch to the skin twice weekly (every 3-4 days). |
| Minivelle | Estradiol | Transdermal patch | Incorrect days' supply. | 68968663708 | 0.00156 mg/hr - 8 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause and prevention of postmenopausal osteoporosis: apply one 0.025 mg/day to 0.1 mg/day transdermal patch to the skin twice weekly (every 3-4 days). |
| Minivelle | Estradiol | Transdermal patch | Incorrect days' supply. | 68968665008 | 0.00208 mg/hr - 8 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause and prevention of postmenopausal osteoporosis: apply one 0.025 mg/day to 0.1 mg/day transdermal patch to the skin twice weekly (every 3-4 days). |
| Minivelle | Estradiol | Transdermal patch | Incorrect days' supply. | 68968667508 | 0.00313 mg/hr - 8 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause and prevention of postmenopausal osteoporosis: apply one 0.025 mg/day to 0.1 mg/day transdermal patch to the skin twice weekly (every 3-4 days). |
| Minivelle | Estradiol | Transdermal patch | Incorrect days' supply. | 68968661008 | 0.00417 mg/hr - 8 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause and prevention of postmenopausal osteoporosis: apply one 0.025 mg/day to 0.1 mg/day transdermal patch to the skin twice weekly (every 3-4 days). |
| Menostar[24] | Estradiol | Transdermal patch | Incorrect days' supply. | 50419045504 | 0.000583 mg/hr - 4 patches | 4 | Patches | 4 days | 4 | Each (transdermal patch) | 28 days | Prevention of postmenopausal osteoporosis: apply one 14 mcg transdermal patch to the skin once every 7 days. |
| Vivelle Dot | Estradiol | Transdermal patch | Incorrect days' supply. | 00078036545 | 0.00104 mg/hr - 24 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause, moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, hypoestrogenism due to hypogonadism, castration, or primary ovarian failure: start with 0.0375 mg/day applied to the skin twice weekly. Prevention of postmenopausal osteoporosis: start with 0.025 mg/day applied to the skin twice weekly. |
| Vivelle Dot | Estradiol | Transdermal patch | Incorrect days' supply. | 00078034345 | 0.00156 mg/hr - 24 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause, moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, hypoestrogenism due to hypogonadism, castration, or primary ovarian failure: start with 0.0375 mg/day applied to the skin twice weekly. Prevention of postmenopausal osteoporosis: start with 0.025 mg/day applied to the skin twice weekly. |

Table 3. Topical Products (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 |
|--------------------|----------------------------------|-------------------|-------------------------|--------------------|-----------------------------------|-----------------------------------|--------------------------------|-------------------------------|---------------------------|--------------------------|-------------------------------|--|
| Vivelle Dot | Estradiol | Transdermal patch | Incorrect days' supply. | 00078034445 | 0.00208 mg/hr - 24 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause, moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, hypoestrogenism due to hypogonadism, castration, or primary ovarian failure: start with 0.0375 mg/day applied to the skin twice weekly. |
| Vivelle Dot | Estradiol | Transdermal patch | Incorrect days' supply. | 00078034545 | 0.00313 mg/hr - 24 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause, moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, hypoestrogenism due to hypogonadism, castration, or primary ovarian failure: start with 0.0375 mg/day applied to the skin twice weekly. |
| Vivelle Dot[25] | Estradiol | Transdermal patch | Incorrect days' supply. | 00078034645 | 0.00417 mg/hr - 24 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause, moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, hypoestrogenism due to hypogonadism, castration, or primary ovarian failure: start with 0.0375 mg/day applied to the skin twice weekly. Prevention of postmenopausal osteoporosis: start with 0.025 mg/day applied to the skin twice weekly. |
| Combipatch | Estradiol/norethindrone | Transdermal patch | Incorrect days' supply. | 68968051408 | 0.00208/0.00583 mg/hr - 8 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause, moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, or hypoestrogenism due to hypogonadism, castration, or primary ovarian failure: 0.05 mg/day estradiol and 0.14 mg to 0.25 mg norethindrone acetate per day via transdermal therapeutic system applied twice weekly. |
| Combipatch[26] | Estradiol/norethindrone | Transdermal patch | Incorrect days' supply. | 68968052508 | 0.00208/0.0104 mg/hr - 8 patches | 8 | Patches | 8 days | 8 | Each (transdermal patch) | 28 days | Moderate to severe vasomotor symptoms due to menopause, moderate to severe symptoms of vulvar and vaginal atrophy due to menopause, or hypoestrogenism due to hypogonadism, castration, or primary ovarian failure: 0.05 mg/day estradiol and 0.14 mg to 0.25 mg norethindrone acetate per day via transdermal therapeutic system applied twice weekly. |
| Ortho Evra[27] | Ethinyl estradiol/norelgestromin | Transdermal patch | Incorrect days' supply. | 50458019224 | 0.035/0.15 mg/hr - 3 patches | 3 | Patches | 21 days | 3 | Each (transdermal patch) | 28 days | Prevention of pregnancy: apply a new patch to the skin each week for 3 weeks (21 total days). Week 4 is patch free. |
| Xulane[28] | Ethinyl estradiol/norelgestromin | Transdermal patch | Incorrect days' supply. | 00378334053 | 0.035/0.15 mg/hr - 3 patches | 3 | Patches | 21 days | 3 | Each (transdermal patch) | 28 days | Prevention of pregnancy: apply a new patch to the skin each week for 3 weeks (21 total days). Week 4 is patch free. |

Table 3. Topical Products (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 |
|--------------------|----------------------|-------------------|---|--------------------|---|-----------------------------------|--------------------------------|-------------------------------|---------------------------|--|-------------------------------|---|
| Sancuso[29] | Granisetron | Transdermal patch | Incorrect days' supply. | 42747072601 | 0.129 mg/hr - 1 patch | 4 | Patches | 4 days | 4 | Each (transdermal patch) | 28 days | Prevention of nausea and vomiting in patients receiving moderately and/or highly emetogenic chemotherapy (chemo) regimens of up to 5 consecutive days' duration. Apply one patch to skin 24 to 48 hours before chemo. Each patch can be worn for up to 7 days depending on the duration of the chemo regimen. |
| Aldara[30] | Imiquimod | Topical cream | Incorrect days' supply. | 99207026012 | 50 mg/ml - 12 packets per box | 12 | Packets | 12 days | 12 | Each (unit of use packet of less than 1 g) | 28 days | Actinic keratosis: 2 times per week for a full 16 weeks. Superficial basal cell carcinoma: 5 times per week for a full 6 weeks. External genital warts: 3 times per week until total clearance or a maximum of 16 weeks. |
| Transderm Scop[31] | Scopolamine | Transdermal patch | Incorrect days' supply. | 10019055301 | 0.0139 mg/hr - 10 patches | 10 | Patches | 10 days | 10 | Each (transdermal patch) | 30 days | Prevention of nausea and vomiting associated with motion sickness: apply 1 patch behind ear 4 hours before antiemetic effect is required for use up to 3 days. Post-operative nausea and vomiting: apply one patch behind ear the evening before scheduled surgery or one hour prior to surgery for cesarean section. |
| Androderm | Testosterone | Transdermal patch | Excessive quantity when billed for number of milligrams instead of patches. | 52544007660 | 0.0833 mg/hr - 2 mg testosterone per patch x 60 patches per carton | 120 | mg | 30 days | 60 | Each (transdermal patch) | 30 days | Primary hypogonadism (congenital or acquired) and hypogonadotropic hypogonadism (congenital or acquired): 4 mg/day system applied nightly for 24 hours. |
| Androderm[32] | Testosterone | Transdermal patch | Excessive quantity when billed for number of milligrams instead of patches. | 52544007730 | 0.167 mg/hr - 4 mg testosterone per patch x 30 patches per carton | 120 | mg | 30 days | 30 | Each (transdermal patch) | 30 days | Primary hypogonadism (congenital or acquired) and hypogonadotropic hypogonadism (congenital or acquired): 4 mg/day system applied nightly for 24 hours. |
| Androgel | Testosterone | Topical gel | Insufficient quantity when billed for number of packets instead of grams. | 00051846231 | 0.0162 mg/mg - 1.25 g (20.25 mg testosterone) per packet x 30 packets per box | 120 | Packets | 30 days | 150 | g | 30 days | Primary hypogonadism (congenital or acquired) and hypogonadotropic hypogonadism (congenital or acquired): minimum of 20.25 mg of testosterone (1 pump actuation or a single 20.25 mg packet) and a maximum of 81 mg of testosterone (4 pump actuations or two 40.5 mg packets). |

Table 3. Topical Products (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 |
|--------------------|----------------------|-------------|---|--------------------|--|-----------------------------------|--------------------------------|-------------------------------|---------------------------|------------------------|-------------------------------|---|
| Androgel | Testosterone | Topical gel | Insufficient quantity when billed for number of packets instead of grams. | 00051846230 | 0.0162 mg/mg - 2.5 g (40.5 mg testosterone) per packet x 30 packets per box | 60 | Packets | 30 days | 150 | g | 30 days | Primary hypogonadism (congenital or acquired) and hypogonadotropic hypogonadism (congenital or acquired): minimum of 20.25 mg of testosterone (1 pump actuation or a single 20.25 mg packet) and a maximum of 81 mg of testosterone (4 pump actuations or two 40.5 mg packets). |
| Androgel | Testosterone | Topical gel | Insufficient quantity when billed for number of packets instead of grams. | 00051846233 | 0.0162 mg/mg - 1.25 g (20.25 mg testosterone) per pump, 60 pumps per bottle, 75 g per bottle x 2 bottles per box | 120 | Pumps | 30 days | 150 | g | 30 days | Primary hypogonadism (congenital or acquired) and hypogonadotropic hypogonadism (congenital or acquired): minimum of 20.25 mg of testosterone (1 pump actuation or a single 20.25 mg packet) and a maximum of 81 mg of testosterone (4 pump actuations or two 40.5 mg packets). |
| Androgel | Testosterone | Topical gel | Insufficient quantity when billed for number of packets instead of grams. | 00051842530 | 0.01 mg/mg - 2.5 g (25 mg testosterone) per packet x 30 packets per box | 120 | Packets | 30 days | 300 | g | 30 days | Primary hypogonadism (congenital or acquired) and hypogonadotropic hypogonadism (congenital or acquired): 50 mg of testosterone (4 pump actuations, two 25 mg packets, or one 50 mg packet), applied once daily in the morning. |
| Androgel | Testosterone | Topical gel | Insufficient quantity when billed for number of packets instead of grams. | 00051845030 | 0.01 mg/mg - 5 g (50 mg testosterone) per packet x 30 packets per box | 60 | Packets | 30 days | 300 | g | 30 days | Primary hypogonadism (congenital or acquired) and hypogonadotropic hypogonadism (congenital or acquired): 50 mg of testosterone (4 pump actuations, two 25 mg packets, or one 50 mg packet), applied once daily in the morning. |
| Androgel[33, 34] | Testosterone | Topical gel | Insufficient quantity when billed for number of packets instead of grams. | 00051848888 | 1.25 g (12.5 mg testosterone) per pump, 60 pumps per bottle, 75 g per bottle x 2 bottles per box | 240 | Pumps | 30 days | 300 | g | 30 days | Primary hypogonadism (congenital or acquired) and hypogonadotropic hypogonadism (congenital or acquired): 50 mg of testosterone (4 pump actuations, two 25 mg packets, or one 50 mg packet), applied once daily in the morning. |

Table 3. Topical Products (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 |
|--------------------|----------------------|------------------|---|--------------------|---|-----------------------------------|--------------------------------|-------------------------------|---------------------------|------------------------|-------------------------------|---|
| Axiron[35] | Testosterone | Topical solution | Insufficient quantity when billed for number of pumps instead of milliliters. | 00002197590 | 20 mg/ml - 60 actuations (30 mg testosterone/ 1.5 ml solution) per 90 ml | 120 | Pumps | 30 days | 180 | ml | 30 days | Primary hypogonadism (congenital or acquired) and hypogonadotropic hypogonadism (congenital or acquired): 30 mg (1 pump actuation) 90 mg to 120 mg (4 pump actuations). |
| Fortesta[36] | Testosterone | Topical gel | Excessive quantity when billed for number of pumps instead of grams. | 63481018316 | 0.02 mg/mg - 0.5 g (10 mg testosterone) per mump, 120 pumps per canister | 120 | Pumps | 30 days | 60 | g | 30 days | Primary hypogonadism (congenital or acquired) and hypogonadotropic hypogonadism (congenital or acquired): 10 mg (1 pump actuation) to 70 mg (7 pump actuations) once daily. |
| Vogelxo | Testosterone | Topical gel | Insufficient quantity when billed for number of tubes instead of grams. | 00245087105 | 0.01 mg/mg - 50 mg testosterone/5 g gel per tube x 30 tubes per box | 60 | Tubes | 30 days | 300 | g | 30 days | Primary hypogonadism (congenital or acquired) or hypogonadotropic hypogonadism (congenital or acquired): 50 mg of testosterone (1 tube, 1 packet, or 4 pump actuations) applied topically once daily at approximately the same time each day. |
| Vogelxo | Testosterone | Topical gel | Insufficient quantity when billed for number of packets instead of grams. | 00245087135 | 0.01 mg/mg - 50 mg testosterone/5 g gel per packet x 30 packets per box | 60 | Packets | 30 days | 300 | g | 30 days | Primary hypogonadism (congenital or acquired) or hypogonadotropic hypogonadism (congenital or acquired): 50 mg of testosterone (1 tube, 1 packet, or 4 pump actuations) applied topically once daily at approximately the same time each day. |
| Vogelxo[37] | Testosterone | Topical gel | Insufficient quantity when billed for number of pumps instead of grams. | 00245087242 | 12.5 mg/actuation - 12.5 mg testosterone/ 1.25 g gel per pump x 60 pumps per tube x 2 tubes per box | 240 | Pumps | 30 days | 300 | g | 30 days | Primary hypogonadism (congenital or acquired) or hypogonadotropic hypogonadism (congenital or acquired): 50 mg of testosterone (1 tube, 1 packet, or 4 pump actuations) applied topically once daily at approximately the same time each day. |

g = grams mg = milligram(s) ml = milliliter(s)

Table 4. Vaginal 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 |
|--------------------|---------------------------------|----------------|-------------------------|--------------------|---|-----------------------------------|--------------------------------|--------------------------------------|---------------------------|------------------------|-------------------------------|--|
| Estring[38] | Estradiol | Vaginal ring | Incorrect days' supply. | 00013215036 | 0.000313 mg/hr - 1 ring | 1 | Ring | 28 days | 1 | Each (ring) | 90 days | Moderate to severe symptoms of vulvar and vaginal atrophy due to menopause: 1 ring inserted into the vagina every 90 days. |
| Femring | Estradiol | Vaginal ring | Incorrect days' supply. | 00430620140 | 0.00208 mg/hr - 1 ring | 1 | Ring | 28 days | 1 | Each (ring) | 90 days | Moderate to severe vasomotor symptoms due to menopause and moderate to severe vulvar and vaginal atrophy due to menopause: 0.05 to 0.10 mg/day via ring inserted into the vagina for 3 months. |
| Femring[39] | Estradiol | Vaginal ring | Incorrect days' supply. | 00430620240 | 0.00417 mg/hr - 1 ring | 1 | Ring | 28 days | 1 | Each (ring) | 90 days | Moderate to severe vasomotor symptoms due to menopause and moderate to severe vulvar and vaginal atrophy due to menopause: 0.05 to 0.10 mg/day via ring inserted into the vagina for 3 months. |
| Vagifem | Estradiol | Vaginal tablet | Incorrect days' supply. | 00169517603 | 0.01 mg - 8 tablets/ applicators per box | 8 | Tablets | 8 days | 8 | Each (tablet) | 28 days | Atrophic vaginitis due to menopause: 1 tablet daily for 2 weeks, followed by 1 tablet twice weekly. |
| Vagifem[40] | Estradiol | Vaginal tablet | Incorrect days' supply. | 00169517604 | 0.01 mg - 18 tablets/ applicators per box | 18 | Tablets | 28 days after first month of therapy | 18 | Each (tablet) | 28 days | Atrophic vaginitis due to menopause: 1 tablet daily for 2 weeks, followed by 1 tablet twice weekly. |
| Nuvaring[41] | Ethinyl estradiol/ etonogestrel | Vaginal ring | Incorrect days' supply. | 00052027303 | 0.000625/ 0.005 mg/hr - 1 ring | 1 | Ring | 1 day | 1 | Each (ring) | 28 days | To prevent pregnancy: one ring inserted into the vagina. The ring is to remain in place continuously for 3 weeks then removed for a 1-week break, during which a withdrawal bleed usually occurs. A new ring is inserted exactly 1 week after the last ring was removed. |

g = grams hr = hour kg = kilograms mcg = micrograms mg = milligram(s) ml = milliliter(s)

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