



P R O V I D E R B U L L E T I N

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To: All Indiana Health Coverage Programs Pharmacy Providers

Subject: Most Common Billing Unit Discrepancies That Result in Manufacturer Drug Rebate Disputes

Note: The information in this bulletin is not directed to those providers rendering services in the risk-based managed care (RBMC) delivery system.

Overview

For any drug manufacturer's products (both legend and over-the-counter) to be covered by the Traditional Medicaid Program the manufacturer must have entered into and have in effect a rebate agreement with the federal government. The essence of the agreement is that the manufacturer agrees to pay each state, on a quarterly basis, a portion of the money that the state expended for that manufacturer's individual products. This process is based on the number of units of each drug the state submits to the manufacturer for rebates. It is **critically** important that Traditional Medicaid Program providers submit the correct number of units on each claim. The greatest number of manufacturer disputes is attributed to the number of units the state charges to the manufacturer.

Some drug products have billable units that are obvious, for example, tablets or capsules are billed as each. Other products, however—injectable products, in particular—do not have obvious correct billing units. IndianaAIM has built-in claims processing logic edits that were designed to identify potentially misbilled units. Even with such edits, some products have had a large number of manufacturer rebate disputes. The purpose of this bulletin and others that will follow on a periodic basis is to highlight products that analysis has shown to cause manufacturer disputes because of potentially misbilled units.

Please be aware that incorrectly billed units cause unnecessary administrative time and resources on the part of both the state and rebating drug manufacturers and slows down the return to the state of the rebate-related proceeds. Also, manufacturers **do retain** the right to require audits of specific providers' billing records, in the event of unresolved disputes. Careful adherence to correct billing of units will ensure that this is not required.

According to records, Tables 1.1 and 1.2 relate those products most commonly disputed by rebating manufacturers. Table 1.2 lists the correct unit definition for drugs with substantial dispute activity.

Billing Unit Definitions

Please be aware that there are **only** three, acceptable billing units for purposes of the Traditional Medicaid Program. They are as follows:

- Each (ea) – The billing unit for capsules, tablets, kits, and unconstituted vials.
- Milliliters (ml) – The billing unit for liquid dosage form having a uniform concentration.
- Grams (gm) – The billing unit for products that are packaged by weight, such as ointments, creams, and powders that are not reconstitutable for injection.

Factors Most Commonly Associated with Rebate-Related Disputes

Analysis consistently reveals the following factors as the most common causes of rebate disputes:

- Incorrect billing unit such as, using the number of milliliters in a vial as opposed to using each to specify the entire contents of the vial

*Note: This example is for illustrative purposes only.
Some products are billed by ml and some by each vial.*

- Provider data entry errors, including those involving decimal or fractional quantities
- Units billed exceeding what would be expected as being within a normal range for the product; for example, the billed units appear inconsistent with what a normally dispensed quantity would be

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- Charge amounts that suggest a generic might have been dispensed when a brand name National Drug Code (NDC) was submitted on the claim

Providers **are encouraged** to contact the Indiana POS/ Pro-DUR Help Desk at 1-877-877-5182 if in the course of billing the Traditional Medicaid Program for dispensed drugs, there is a question on what constitutes the correct unit for that drug. All efforts to help minimize the number of manufacturer disputes are appreciated.

Please compare current billing practices to the indicated billing unit in the following tables to ensure consistency.

Table 1.1 – Billing Units for Commonly Billed Products

Drug Product	Billing Unit
Oral Antibiotic Suspensions	ml
All Oral Inhalers	gm
Ointments and Creams	gm
Ativan Tubex Syringes	ml
Ready-To-Use IV Antibiotic Minibags	ml
Metamucil and Psyllium-like Products (Jar)	gm
Metamucil and Psyllium-like Products (Packet)	ea
Birth Control Pills	ea (tablet)
Glucagon F 1 mg Emergency Kit	ea (kit)
Rocephin 10 gm Vial	ea
Norplant System	ea (kit)

Table 1.2 contains a list of specific drug products and the correct billing unit.

Table 1.2 – Disputed NDC Information

Drug Product	Billing Unit
2% XYLOCAINE VISCOUS SOL	ml
ACETAMINOPHEN TAB	ea
ADVIL 100MG /5ML SUSP	ml
ALBUTEROL .83MG/ML SOLN	ml
ALBUTEROL SULF 2MG/5ML SYRP	ml
ALLBEE W/C	ea
ALLOPURINOL TAB	ea

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Table 1.2 – Disputed NDC Information

Drug Product	Billing Unit
ALPRAZOLAM 25MG TAB	ea
AMANTODINE 100MG CAP	ea
AMILORIDE HCL/HCTZ 5/50 TAB	ea
AMITRIP/PERPHEN TAB	ea
AMOXICILLIN SUSP	ml
AMOXICILLIN CAP	ea
AMPICILLIN TR 250MG CAP	ea
ANTI-DIARRHEAL 2MG CAP	ea
ANTURANE 200MG CAP	ea
AQUASOL 25000IU CAPSULE	ea
AQUASOL 50000U/ML VIAL	ml
AQUASOL E 50IU/ML DROPS	ml
ARTANE 2MG /5ML ELIXER	ml
ARTIFICIAL TEARS DROPS	ml
ARTIFICIAL TEARS EYE OINT	gm
ASA 325MG TAB	ea
ASCORBIC ACID 500MG TAB	ea
ASPIRIN 81MG TAB CHEW	ea
ATENOLOL 100MG TAB	ea
ATIVAN 2MG/ML TUBE X SYR	ml
ATIVAN 2MG/ML VIAL	ml
ATPRAXOLAM 0.25MG TAB	ea
ATROPINE 1% EYE DROPS	ml
AYGESTIN 5MG TAB	ea
AZMACORT INHALER	gm
BACITRACIN 500U/GM OINT.	gm
BACLOFEN TAB	ea
BANOPHEN 12.5MG/5ML ELIX	ml
BENZTROPINE MES 1MG TAB	ea
BETAMETHASONE VA .1% OINT	gm
BETHAPRIM 400-80MG TAB	ea
BISACODYL 10MG SUPPOSITORY	ea

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Table 1.2 – Disputed NDC Information

Drug Product	Billing Unit
BISACODYL 5MG TAB EC	ea
BONDAMINE-DM SYRUP	ml
BREVICON 28 TAB	ea
BUTISOL SOD 30MG	ea
CALCIUM CARB CHEW	ea
CALCIUM W/VITAMIN D TAB	ea
CAPTOPRIL TAB	ea
CARBIDOPA/LEVO TAB	ea
CATAPLES-TTS PATCH	ea
CEFACLOR 250MG/5ML SUSP	ml
CENTRUM	ea
CENTRUM-LIQUID	ml
CERTA-VITE LIQUID	ml
CERTA-VITE TAB	ea
CHILD CHEW + IRON TAB CHEW	ea
CHILD CHEW VITAMIN TAB	ea
CHILDREN'S TYLEN 160MG/5ML	ml
CHLORDIAZIPOXIDE 25MG CAP	ea
CHOLINE MAQ TN SAL 750MG TB	ea
CIMETIDINE 200MG TAB	ea
CLEOCIN PHOS 150MG/ML VIAL	ml
CLINDAMYCIN PH 1% SOLUTION	ml
CLONIDINE HCL TAB	ea
CLOZAPINE TABS	ea
COLACE 100MG	ea
CORDARONE 200MG TAB	ea
CYCLOBENZAPRINE 10MG TAB	ea
CYPROHEPTADINE 2MG/5ML SYRUP	ml
DARVOCET-N	ea
DARVON-N 100MG TAB	ea
DECLOMYCIN TAB	ea
DELTASONE 5MG TAB	ea

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Table 1.2 – Disputed NDC Information

Drug Product	Billing Unit
DEPO-PROVERA 100MG/ML VIAL	ml
DESIPRAMINE 25MG TAB	ea
DEXAMETHASONE .5MG/5ML ELX	ml
DIAMOX SEQUELS 500MG CAP SA	ea
DIAZEPAM TAB	ea
DICLOXACILLIN 500MG CAP	ea
DIFLUNISAL 500MG TAB	ea
DILTIAZEM TAB	ea
DIPHENHYDRAMINE 2% CREAM	gm
DIPHENHYDRAMINE CAP	ea
DOBUTAMINE 500MG/D5W 250ML	ml
DOCUSATE CALCIUM 240MG CAP	ea
DOCUSATE SODIUM 100MG CAP	ea
DOK 100MG CAP	ea
DOXEPIN CAP	ea
DSS/CASANTHRANOL 100/30 CAP	ea
DSS/CASANTHRANOL SYRUP	ml
DURAGESIC 100MCG/HR PATCH	ea
ECOTRIN 325MG TAB EC	ea
EFFEXOR TAB	ea
ERGOLOID MESYLATES 1MG TAB	ea
ETODOLAC CAP	ea
FARBITAL CAP	ea
FEIBA VH IMMUNO 400-800U VL	ea
FENOPROFEN 600MG TAB	ea
FEOSOL 220MG/5ML ELIXER	ml
FERROUS SULF 325MG TAB	ea
FIBER-EZE POWDER	gm
FIBER-EZE SMOOTH POWDER	gm
FLEET ENEMA	ml
FLUOCINOLONE .01% SOLN	ml
FLUOCINONIDE 0.05% OINTMENT	gm

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Table 1.2 – Disputed NDC Information

Drug Product	Billing Unit
FLUPHENAZINE TAB	ea
FOLIC ACID 1MG TAB	ea
FORMULA B TAB	ea
FUROSEMIDE TAB	ea
FURROUS SULF 220MG/5ML ELIX	ml
GENTAMICIN 0.1% CREAM	gm
GEVRABON-LIQUID	ml
HALCION .125MG TAB	ea
HALOPERIDOL TAB	ea
HEM-PREP SUPPOSITORY	ea
HYDRALAZINE 25MG TAB	ea
HYDROCODONE/APAP 10/650 TAB	ea
HYDROCORTISONE 1% CREAM	gm
HYDROCORTISONE POWDER	gm
HYOSCYAMINE .375MG CAP SA	ea
IBUPROFEN TAB	ea
ILETIN II PORK LEN 100U/ML	ml
IMIPRAMINE 50MG TAB	ea
IMITREX 6MG VIAL	ml
INDERAL LA CAP	ea
INFANT'S TYLENOL DROPS	ml
INFERGEN 15MCG/0.5ML VIAL	ml
IRON CAPLET W/STOOL SOFTENER	ea
IRON FOLIC 500MG TAB SA	ea
ISORDIL 40MG TAB	ea
ISOSORBIDE DN TAB	ea
KADIAN 100MG CAP SR	ea
KEFLEX 250MG/5ML ORAL SUSP	ml
KETOPROFEN 75MG CAP	ea
LACTULOSE 10GM/15ML SYR	ml
LEVAQUIN 500MG	ea
LEVOTHYROXINE TAB	ea

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Table 1.2 – Disputed NDC Information

Drug Product	Billing Unit
LODINE CAP	ea
LODINE XL 600MG	ea
LOPRESSOR HCT	ea
LORAZEPAM TAB	ea
LOXAPINE SUCCINATE 5MG CAP	ea
L-THYROXINE TAB	ea
M.V.I. VIAL	ml
M.V.I. 12 COMBO PKG	ea
MAALOX PLUS SUSP	ml
MAJOR TEARS DROPS	ml
MAJOR TEARS EYE OINTMENT	gm
MAPROTILINE 25MG TAB	ea
MATULANE 50MG CAP	ea
MAXAQUIN 400MG	ea
MELLARIL 10 MG TAB	ea
METAMUCIL	gm
METAPROTERENOL TAB	ea
METHAZOLAMIDE TAB	ea
METHENAMINE MD 500MG TAB EC	ea
METHOTREXATE	ea
METHYLDOPA 500MG TAB	ea
METHYLPHENIDATE 20MG TAB	ea
METHYLPHENIDATE 20MG TAB SA	ea
METOCLOPRAMIDE 5MG TAB	ea
METOPROLOL TAB	ea
MICRO-K 10 MEQ	ea
MILK OF MAGNESIA SUSP	ml
MINERAL OIL	ml
NAPROXEN 375MG	ea
NASALCROM 4%	ml
NIACIN CAP SA	ea
NIACIN TAB	ea

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Table 1.2 – Disputed NDC Information

Drug Product	Billing Unit
NIFEDIPINE 10MG CAP	ea
NITROFURANTION	ea
NITROGLYCERINE	ea
NITROGLYCERINE .2MG/HR PATCH	ea
NORINYL 1+35-28 TAB	ea
NOVOLIN 70/30 CARTRIDGE	ml
NOVOLIN N 100U/ML CARTRIDGE	ml
NOVOSEVEN 4800MCG	ea
NYSTATIN CREAM 100000U/GM	gm
ORA-SWEET SF SYRUP	ml
ORUVAIL 200 MG CAP SA	ea
OXYCODONE W/APAP 5/325 TAB	ea
OYSTER + D 500MG TAB	ea
OYSTER SHELL 500 MG TAB	ea
OYSTER SHELL CAL 500MG TAB	ea
OYSTER SHELL W/VIT. D TAB	ea
PENICILLIN VK TAB	ea
PERI-COLACE	ea
PERPHENAZINE TAB	ea
PHENAZOPYRIDINE TAB	ea
PHENERGAN SUPPOSITORY	ea
PHENERGAN TAB	ea
PHENERGAN 25MG/ML AMPULE	ml
PHENERGAN 25MG/ML TUBE X SYR	ml
PHOSPHATE ENEMA	ml
PHOSPHOLINE IODIDE .25%	ml
PIPERONYL BUTOXIDE LIQUID	ml
POLY-VI-SOL DROP	ml
POLY-VI-SOL IRON , ZN TAB	ea
POTASSIUM CHLORIDE 20% LIQUID	ml
POTASSIUM CL TAB SA	ea
PRAZOSIN 1MG CAP	ea

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Table 1.2 – Disputed NDC Information

Drug Product	Billing Unit
PREDNISONE 20MG TAB	ea
PREMARIN TAB	ea
PREMARIN VAGINAL CREAM REFL	gm
PREMARIN VAGINAL CREAM/APPL	gm
PREMPRO TAB	ea
PRENATAL 1 TABLET	ea
PROCAINAMIDE 500MG TAB SA	ea
PROCHLORPERAZINE 5MG/ML VL	ml
PROGESTERONE PWD MICRONIZED	gm
PROMETHAZINE 25MG/ML AMPUL	ml
PROMETHAZINE 6.25MG/5ML SYR	ml
PROPOXY-N APAP100-650 TAB	ea
PROPRANOL/HCTZ TAB	ea
PROPRANOLOL CAP SA	ea
PSEUDO-CHLOR CAP SA	ea
PSEUDO-G/PSI TAB SA	ea
PYRIDOXINE 50MG	ea
QUIBRON-T-SR	ea
QUININE SULFATE CAP	ea
QUININE SULFATE TAB	ea
REGLAN TAB	ea
RENTAMINE PEDIATRIC SUSP	ml
ROBAFEN-DAC SYRUP	ml
ROBAXISAL	ea
ROBINUL .2MG/ML VIAL	ml
ROBINUL 1MG	ea
SELEGILINE HCL 5MG TAB	ea
SENNA TABLET	ea
SILVER SULFADIAZINE 1% CREAM	gm
SLO-BID 300 GYRO CAPS	ea
SODIUM BIC 650MG TAB	ea
SODIUM BICARB 8.4% VIAL	ml

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Table 1.2 – Disputed NDC Information

Drug Product	Billing Unit
SODIUM CHLORIDE 0.9% AMPULE	ml
STELAZINE 10MG TAB	ea
STRESS FORMULA/ZINK TAB	ea
STRESS-600 TAB	ea
SUDOGEST 30MG TAB	ea
SULFAMIDE 10% EYE DROPS	ml
SYNVISC-SYRINGE	ml
TENEX TAB 2MG	ea
TESTOSTERONE POWDER	gm
THEOPHYLLINE CAP SA	ea
THEOPHYLLINE TAB SA	ea
THEOPHYLLINE 80MG/15ML ELIX	ml
THERA LIQUID	ml
THERA TABLET	ea
THERAPEUTIC MULTIVIT TAB	ea
THIAMINE 100MG	ea
THIORIDAZINE 10MG TAB	ea
THIOTHIXENE CAP	ea
TIMENTIN 3.1 GM RTU BAG	ml
TOLAZAMIDE 250MG TAB	ea
TRANSDERM-SCOP 1.5MG/72HR	ea
TRIAMTERENE/HCTZ 50/25 CAP	ea
TRI-FAC CAPSULE	ea
TRIFLUOPERAZINE 10MG TAB	ea
TRI-NORINYL TAB	ea
TRINSICON CAP	ea
TRI-VI-SOL DROPS	ml
TUMS 500 TAB CHEWABLE	ea
UNICAP TAB	ea
VENTOLIN 90 AEROSOL	gm
VERELAN PELLETT 120MG CAP	ea
VI-C FORTE CAP	ea

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Table 1.2 – Disputed NDC Information

Drug Product	Billing Unit
VIT A CAP	ea
VIT B-1 TAB	ea
VIT C CAP SA	ea
VIT C TAB	ea
VIT E CAP	ea
VITAMIN A SOFTGEL	ea
VITAMIN D TAB	ea
VIVELLE PATCH	ea
XALATAN 0.005%	ml
ZIAC TAB	ea
ZINC GLUCONATE 50MG TAB	ea
ZINC OXIDE OINT	gm
ZOSYN 3/3.75G PRE-MIX BAG	ml