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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 a drug manufacturer's products (legend and over-the-counter) to be covered by the Indiana Health Coverage Programs (IHCP), the manufacturer must have entered into and have in effect a rebate agreement with the federal government. The agreement states that the manufacturer agrees to pay each state a portion of the money that the state expended for that manufacturer's individual products each quarter. This is based on the number of units of each drug the state submits to the manufacturer for rebates. Therefore, IHCP providers must 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 the manufacturer.

Billing units for some drug products may seem easy to determine, such as tablets or capsules that are billed as each. Correct billing units for injectable products and other products may not be easy to determine. IndianaAIM has claims processing logic edits 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 is to highlight products that analysis has shown to cause manufacturer disputes because of potentially misbilled units.

*Note: Incorrectly billed units require more administrative time and resources of the state and rebating drug manufacturers and slows down the return to the state of the rebate-related proceeds.*

Also, manufacturers **retain the right** to audit specific providers' billing records, in the event of unresolved disputes. Careful adherence to correct billing units should help ensure that this is not required.

According to drug rebate 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

The IHCP accepts **only three** billing units. They are the following:

- *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 packaged by weight, such as ointments, creams, and powders that cannot be reconstituted 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 units, such as, billing for the number of milliliters in a vial instead of billing *each* to specify the entire contents of the vial

*Note: This example is an illustration only. Some products are billed by ml and some by each vial.*

- Provider data entry errors including those involving decimal or fractional quantities

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

Providers should contact the Indiana Point-of-Service (POS)/ Prospective Drug Utilization and Review (Pro-DUR) Help Desk at 1-877-877-5182 if there is a question about what constitutes the correct unit for a drug being billed to the IHCP. 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
Enbrel 25mg Kit	ea (kit)
Gammagard s/d 5gm v1 w/set	ea (vial/set)
Nordette 28 Tab	ea (kit)
Norplant System Kit	ea (kit)
Novoseven 4800mcg	ea (mcg)
Ready-To-Use IV Antibiotic Minibags	ml
Recombinant 801-1240AHFU vial	ea (AHFUunit)
Birth Control Pills	ea (tablet)
Glucagon F 1 mg Emergency Kit	ea (kit)
Premarin 1.25mg Cycle Pak	ea (tab)
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
.9% Sodium Chloride Soln	ml
2% Xylocaine Viscous Sol	ml
Acetaminophen 160mg/5ml Elixir	ml

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Table 1.2 – Disputed NDC Information

<b>Drug Product</b>	<b>Billing Unit</b>
Acetaminophen Unisert 120mg	ea
Acetylcysteine 10% Vial	ml
Acular .5% Eye Drops	ml
Albuterol .83mg/ml Soln	ml
Albuterol Sulf 2mg/5ml Syrp	ml
Aluminum Hydroxide Gel Conc	ml
Amethapred 125mg Univial	ea
Amethapred 40mg Univial	ea
AMOXICILLIN SUSP	ml
Amoxicillin 250mg Tab Chew	ea
Ampicillin 250mg/5ml Susp	ml
APL 20000u Vial	ea
Aquasol 50000u/ml Vial	ml
Arthritis Form Capsaicin Cr	gm
Artificial Tears Drops	ml
Artificial Tears Eye Oint	gm
Ativan 2mg/ml Tube X Syr	ml
Ativan 2mg/ml Vial	ml
Atrohist Pediatric Susp	ml
Bacit/Polymyxin Eye Ointment	gm
Bacitracin 500u/gm Oint.	gm
Bactrim Suspension	ml
Bactroban 2% Ointment	gm
Banophen 12.5mg/5ml Elix	ml
B-D Glucose Tablet Chew	ea
Benefix 500IU Vial	ea
Benzoyl Peroxide 2.5% Wash	ml
Benzoyl Peroxide 5% Gel	gm
Betamethasone VA .1% Lotion	ml
Betamethasone VA .1% Oint	gm
Bethaprim Suspension	ml
Bion Tears Eye Drops	ea

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Table 1.2 – Disputed NDC Information

<b>Drug Product</b>	<b>Billing Unit</b>
Bisacodyl 10mg Suppository	ea
Bondamine-Dm Syrup	ml
Brevicon 28 Tab	ea
Bromanate Dx Syrup	ml
Bromophen Elixir	ml
Capsium Oleoresin .025% Cm	gm
Catapres-Tts Patch	ea
Cefazolin 1gm/D5w Bag	ml
Cernevit Multivitamin Vial	ea
Centrum-Liquid	ml
Certa-Vite Liquid	ml
Cetapred .25% Eye Ointment	gm
Children's Advil Susp Drop	ml
Children's Tylenol Drops	ml
Ciloxan .3% Ointment	gm
Clemastine .67mg/5ml Syrup	ml
Cleocin Phos 150mg/ml Vial	ml
Clindamycin Ph 1% Solution	ml
Clybetasol .05% Gel	gm
Cortisporin Ear Susp	ml
Cortisporin Eye Drops	ml
Cyproheptadine 2mg/5ml Syrup	ml
D5-1/2 NS/KCL 20meq/L IV Sol	ml
Denavir 1% Cream	gm
Depo-Provera 100mg/MI Vial	ml
Desmopressin .1mg/ml Spray	ml
Desoximetasone .05% Cream	gm
Dextrose 2.5%-1/2 Ns IV Soln	ml
Dibucaine 1% Ointment	gm
Dicomal-Dh Syrup	ml
Digoxin 50mcg/ml Elixir	ml
DSS/Casanthranol Syrup	ml

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Table 1.2 – Disputed NDC Information

<b>Drug Product</b>	<b>Billing Unit</b>
Dyphenhydramine Elixir	ml
Efudex Cream 5%	gm
Efudex Solution 5%	ml
Ery 2% Pads	ea
Erythromycin 2% Gel	gm
Erythromycin 2% Pledgets	ea
Erythromycin 200mg/5ml Susp	ml
Erythromycin Eye Ointment	gm
Erythromycin/Sulfisox Susp	ml
Ferrous Sulf 220mg/5ml Elix	ml
Fiber-Eze Powder	gm
Flonase Nasal Spray .05%	gm
Floucinolone .025% Cream	gm
Flourouracil 50mg/ml Vial	ml
Floxin IV 4mg/ml Mini Bag	ml
Fluocinonide 0.05% Ointment	gm
Fragmin 2500u Syringe	ml
Furosemide 10mg/ml Oral Sol	ml
Gentamicin 0.1% Cream	gm
Gentamicin 3mg/ml Eye Drops	ml
Gentamicin 40mg/ml Vial	ml
Geravim Liquid	ml
Gevrabon-Liquid	ml
Golytely Packet	ea
Guaifenesin 100mg/5ml Syrup	ml
H-Cortisone/Iodoquinol Cream	gm
Hemorrhoidal Prep Ointment	gm
Hem-Prep Suppository	ea
Humalog 100u/ml Vial	ml
Humalog Cartridge 100u/ml	ml
Humatrope 24mg Cartridge	ea
Humatrope 5mg Vial	ea

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Table 1.2 – Disputed NDC Information

<b>Drug Product</b>	<b>Billing Unit</b>
Hydrocortisone 1% Cream	gm
Hydrocortisone 1% Lotion	ml
Hydroquinine 3% Soln	ml
Hydroquinine 4% Cream	gm
Hydroquinine 4% Gel	gm
Hydroxyzine 10mg/5ml Syrup	ml
Infant's Tylenol Drops	ml
Iophen Dm Liquid	ml
Kaopectate	ml
Kristalose Packet	ea
Kytril 1mg/ml Vial	ml
Lactulose 10gm/15ml Syr	ml
Lacri-Lube NP Ointment	ea
Leucovorin Calcium 350mg Vial	ea
Leukine 500mcg Vial	ea
Levobunolol .5% Eye Drops	ml
Levora-28 Tab	ea
Lindane 1% Shampoo	ml
Lithium Cit 8meq/5ml Syrup	ml
Lotemax .5% Eye Drops	ml
M.V.I. 12 Combo Pkg	ea
Major Tears Drops	ml
Major Tears Eye Ointment	gm
Major-Con Drops	ml
Mapap 100mg/ml Drop	ml
Mapap 160mg/5ml Elixir	ml
Maxitrol Eye Ointment	gm
Metamucil Powder	gm
Milk of Magnesia Susp	ml
Monistat 7 100mg Vag Supp	ea
Monistat Cream	gm
Monistat Derm 2% Lotion	ml

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Table 1.2 – Disputed NDC Information

<b>Drug Product</b>	<b>Billing Unit</b>
Morphine 2mg/ml Syringe	ml
Nasalcrom 4%	ml
Natural Fiber Lax Powder	gm
Neocidin Eye Drops	ml
Neumega 5mg Vial	ea
Nitroglycerine 2% Ointment	gm
Norinyl 1+35-28 Tab	ea
Norinyl 1+50-28 Tab	ea
Nor-Qd	ea
Novolin N 100u/ml Cartridge	ml
Nubain 10mg/MI Ampul	ml
Nuprin 200mg Tab	ea
Nystatin Cream 100000u/gm	gm
Nystatin 100000u/gm Ointment	gm
Ocucoat PF Eye Drops	ea
Ogen Vag Cream	gm
Ortho-Diaphragm Allflex 65mm	ea
Paregoric Liquid	ml
Pediapred 6.7mg/5ml Soln	ml
Pediatric Decongestant Drop	ml
Penicillin V <sub>k</sub> 125mg/5ml Liq	ml
Phenergan Suppository	ea
Phenergan 25mg/MI Ampule	ml
PhisoHex 3% Cleanser	ml
Phosphate Enema	ml
Phospholine Iodide .25%	ml
Phospholine Iodide .06% Drop	ml
Pilocarpin 2% Eye Drop	ml
Potassium Chloride 20% Liquid	ml
Potassium Gluconate Elixir	ml
Povidine-Iodine 10% Soln	ml
Prednisolone AC 1% Eye Drop	ml

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Table 1.2 – Disputed NDC Information

<b>Drug Product</b>	<b>Billing Unit</b>
Premarin Vaginal Cream Refl	gm
Premarin Vaginal Cream/Apl	gm
Prochlorperazine 5mg/ml V1	ml
Procrit 10000u/ml Vial	ml
Promethazine 50mg Supp	ea
Promethazine VC Expectorant	ml
Promethazine/Codeine Syrup	ml
Pulmicort 200mcg Turbohaler	ea
Rhinocort Aqua Nasal Spray	gm
Robinul .2mg/ml Vial	ml
Rocephin 10mg Vial	ea
Rondec Syrup	ml
Silver Sulfadiazine 1% Cream	gm
Sodium Chloride 0.9% Ampule	ml
Sodium Chloride .9% Irrig	ml
Sodium Chloride .9% Soln	ml
Sodium Sulfacet/Sulfur Lotion	gm
Solu-Medrol 1000mg Vial	ea
Sulfamide 10% Eye Drops	ml
Synvisc-Syringe	ml
Tears Naturale Free Drops	ea
Theophylline 80mg/15ml Elix	ml
Thera Liquid	ml
Thrombin-JMI 5mu Vial	ea
Timentin 3.1 Gm RTU Bag	ml
Tobramycin .3% Eye Drops	ml
Tobramycin 40mg/ml Vial	ml
Tobrex Eye Ointment .3%	gm
Triamcinolone .025% Ointment	gm
Tri-Norinyl 28 Tab	ea
Triphasil 28 Tab	ea
Tri-Statin II Cream	gm

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Table 1.2 – Disputed NDC Information

<b>Drug Product</b>	<b>Billing Unit</b>
Tri-Tannate Susp	ml
Trivora-28 Tab	ea
Ty-Pap W/Codeine Elixir	ml
Vancocin Hcl 500mg/100ml	ml
Vancomled 1gm Vial	ea
Vancomycin 1mg Vial	ea
Vancomycin Add-Vantage Vial	ea
Vasolate-HC Ear Drops	ml
Ventolin 90 Aerosol Inhaler	gm
Vita Drops	ml
Vita Drops w/Iron	ml
Vitamin B12 1000mcg/ml Vial	ml
vitamin E	ea
Xalatan 0.005%	ml
Xeloda 500mg Tab	ea
Zebeta Tab 5mg	ea
Zinc Gluconate 50mg Tab	ea
Zinc Sulfate 220mg Cap	ea
Zosyn 3/3.75g Pre-Mix Bag	ml