

Physician Administered Drug (PAD) FAQs

1. Does the drug administered by the physician and billed to Health First Colorado with an NDC have to be a “rebateable” drug?
 - a. Yes. Manufacturers who wish their drug to be eligible for coverage by Health First Colorado must enter into a rebate agreement with Centers for Medicare and Medicaid Services (CMS).
2. How do I know if a drug is rebateable?
 - a. Please refer to the CMS website at www.cms.gov or [Appendix X](#) (the HCPCS/NDC Crosswalk).
3. The NDC is not rebateable or I am not sure which NDC was used, can I pick another NDC under the J-Code and bill with it?
 - a. No. The NDC submitted to Health First Colorado must be the actual NDC number on the package or container from which the medication was administered. It is considered a fraudulent billing practice to bill using an NDC other than the one administered.
4. Which NDC do we use, the one from the package or the vial?
 - a. Providers should use the NDC listed on the vial that is actually dispensed. The NDC is found on the drug container (i.e. vial, bottle, or tube). The NDC submitted to Health First Colorado must be the actual NDC number on the package or vial from which the medication was administered. If the vial is removed from a carton of similar vials, use the NDC on the individual bottle (inner package NDC) and not the NDC from the carton (outer package NDC). The only exception to this is if the vial is part of a kit that contains multiple products. In this case use the NDC on the kit.
5. Can you confirm the NDC requirement is for outpatient claims only?
 - a. Yes, this requirement applies to all drug products administered by a clinician in outpatient settings, including physician's office, clinic, hospital and any other outpatient setting. The only exceptions to the NDC requirement are institutional inpatient claims.
6. Do radiopharmaceuticals, contrast media, devices or vaccines/immunizations require an NDC?
 - a. Yes, some radiopharmaceuticals, contrast media, devices, and vaccines/immunizations may require a valid HCPCS/NDC combinations, even though they are not considered PADs. Please refer to [Appendix X](#) for a list of these products.
7. Who do I contact if I have questions about billing with an NDC?
 - a. Refer to the [Appendix X](#) or call DXC Provider Services at 1-844-235-2387.
8. I want to administer a PAD but cannot find the HCPCS and/or the NDC on the HCPCS/NDC Crosswalk provided by Health First Colorado. Who do I contact to request a review?
 - a. Email your request for review to hcpf_Colorado.SMAC@state.co.us with the HCPCS and all associated NDCs that are believed to be missing from the HCPCS/NDC Crosswalk.
9. Are Medicare primary claims excluded from the NDC requirement?
 - a. No. Medicare Part B Crossover claims require NDCs to be billed with the HCPCS codes.

10. I am a 340B participating hospital. Do I need to submit NDC codes for drug claims?
 - a. Yes. Although 340B purchased claims are not eligible for drug rebates, Health First Colorado requires the submission of this data.

11. Can my office receive the medication from a specialty pharmacy or can the member bring the PAD to the office and I just administer the medication?
 - a. No. In this scenario, the pharmacy would bill the pharmacy benefit and the medical provider would administer the PAD. These processes are referred to as “white” and “brown-bagging”, respectively and are not allowed under the Health First Colorado PAD policy.
 - b. Some PADs can be considered a pharmacy benefit in certain situations but cannot be sent to the provider’s office for administration.
 - i. For additional information, please refer to the [Pharmacy Resources](#) page and the most current version of Appendix P.

12. I need help enrolling as a Health First Colorado provider, billing medical claims or need to speak with customer service, who do I contact?
 - a. Please call DXC Provider Services at 1-844-235-2387 for any issues or questions on enrollment, billing PADs, training or the provider portal.

13. Is there a PAD billing manual I can refer to when building a PAD claim?
 - a. Yes. Please refer to the [PAD Billing Manual](#), [Appendix X](#) and the [PAD Fee Schedule](#) when building PAD claims.