



Maryland Medicaid Pharmacy Program Pharmacy News & Views

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Maryland Department of Health and Mental Hygiene / Office of Systems, Operations and Pharmacy

Tamper-Resistant Prescription Pads Required as of April 1, 2008

On April 1, 2008 the Maryland Medicaid Pharmacy Program (MMPP) began phasing in the 2007 federally mandated requirement for written tamper-resistant prescription forms. The requirement applies to pharmacies seeking reimbursement from the Medicaid Program.

Prescriptions written for MD Medicaid recipients that are to be paid for by the Medicaid Program must bear industry recognized security characteristics that fall within each of the 3 categories listed below. For each of these categories, the MMPP has identified specific security features that constitute an acceptable tamper-resistant pad or paper. The table below provides a listing of those security features. The bolded features are those that are preferred. Generally a tamper-resistant pad or paper must be designed to (1) prevent unauthorized copying of an either completed or blank prescription, (2) prevent erasure or modification of the prescription as originally written by the prescriber, and (3) prevent the use of counterfeit prescription pads or paper. From April 1 to September 30, only one security feature will be required. Beginning October 1, 2008, each written prescription must bear a security feature from each of the three categories.

Table of Tamper-Resistant Features

Category 1 - One or more industry-recognized features designed to prevent unauthorized copying of a completed or blank prescription form.	
Feature	Description
“Void” pantograph	The word “Void” appears when a document is photocopied. Pharmacy must note on prescription if received via fax.
Watermarking	Special paper containing “watermarking”
Reverse ‘RX’ or White are on prescription	“RX” symbol or white area disappears when photocopied at light setting. This feature is normally paired with the “Void” pantograph to prohibit copying.

Category 2 - One or more industry-recognized features designed to prevent the erasure or modification of information written on the prescription by the prescriber.	
Feature	Description
Uniform non-white background color-preferably green	Background that consists of a solid color or consistent pattern that has been printed onto the paper. This will inhibit a forger from physically erasing written or printed information on a prescription form. If someone tries to erase or copy, the consistent background color will look altered and show the color of the underlying paper.

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Epocrates to Expand Formulary Access

Currently the Maryland Medicaid Pharmacy Program Preferred Drug List (PDL) can be found on Epocrates. Using this resource, providers can find the most up-to-date formulary information for Maryland Medicaid. Updates are done on a weekly basis to account for the release of brand name drugs and generic substitutions. Beginning in May 2008, providers will also be able to access formularies for the managed care organizations (MCOs) that also provide coverage to Medicaid recipients. These MCOs include AMERIGROUP Community Care, Diamond Plan from Coventry Health Care, Jai Medical Systems, Maryland Physicians Care, MedStar Family Choice, Priority Partners, and UnitedHealthcare.

Epocrates can be accessed at www.epocrates.com. Formulary information is available free of charge. Other free features include drug labeling information and a multi-check multiple-drug interaction checker. Registration is required. To register click on Epocrates online, which is located on the upper right corner of the Epocrates homepage.

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Quantity check-off boxes, or, for computer-generated printed prescriptions, border characteristics	In addition to the written quantity on the prescription, quantities are indicated in ranges. It is recommended that ranges be 25's with the highest being "151 and over". The range box corresponding to the quantity prescribed MUST be checked for the prescription to be valid. An example of a valid border characteristic is the use of asterisks to surround the numeric quantity prescribed on a computer generated printed prescription (Example: **50**)
Refill indicator or, for computer-generated printed prescriptions, border characteristics	Indicates the number of refills on the prescription. Circle or check number of refills or "NR". Refill number MUST be used to be a valid prescription. An example of a valid border characteristic is the use of asterisks to surround the number of refills permitted, e.g. **5 refills**

Category 3 - One or more industry-recognized features designed to prevent the use of counterfeit prescription forms.	
Features	Description
Security features and descriptions listed on the front of the prescription	Listing of the security features of the prescription for compliance purposes. This will assist the pharmacist and auditors on what security features are included on the pads/paper.

The MMPP has provided prescribers a listing of the requirements and they are being encouraged to acquire tamper-resistant pads or paper prior to the April 1 deadline.

In the event a pharmacist receives a prescription dated on or after April 1 that is not on a tamper-resistant pad, the pharmacist is to verify the prescription with the provider. The pharmacist is then to document on the prescription the person who verified the prescription and the date of verification. Pharmacies are to provide a 72-hour emergency supply to Medicaid recipients while the pharmacy awaits approval of a prescription that needs verification.

The MMPP asks pharmacists to notify them of any providers who consistently use non-compliant pads or paper. Tamper-Resistant Forms will NOT be required in the following circumstances:

1. The prescription has been phoned in, faxed, or electronically transmitted.
2. The prescription is covered by a managed care organization.
3. The prescription was written before April 1 but presented after that date.
4. Refills of a prescription originating prior to April 1.
5. When patients do not have the opportunity to physically handle the prescription as in the case of long term care facilities or nursing homes.

Registration of Pharmacy Technicians

Legislation in Maryland requiring pharmacy technicians to be registered has now taken effect. All pharmacy technicians currently employed in Maryland pharmacies will be required to be registered by July 28, 2008. To become registered all non-registered personnel working in a pharmacy must submit a signed and completed registration application to the Board of Pharmacy, submit a request for a State Criminal History Record check, and pay the appropriate fees. Additional requirements are determined by employment status. Upon registration, the pharmacy technician will receive a registration card and pocket identification. Renewal will be required one year after the initial registration and every two years thereafter. To renew registration, 10 hours of approved continuing pharmaceutical education must be completed within the one year period following initial registration and 20 hours of approved credit for every two year registration period. For additional and complete details, please see the Maryland Board of Pharmacy website at www.mdbop.org and click on pharmacy technicians.

Advisory: Help Needed from Prescribers — Specificity Encouraged on Prescriptions

In order to assist pharmacists, it is requested that prescribers write specific dosing instructions on prescriptions whenever possible, and not just indicate, "use as directed." Pharmacists are required to input an exact number for the days supply when submitting claims for any prescription to pharmacy benefit managers. If they do not know the exact frequency, it may be hard to determine for how long a medicine is being prescribed. Without this information, there could be a delay in the dispensing of the prescription to the patient. All prescription insurance companies require an accurate days supply be transmitted on the claim.

Responsible Use of Intervention Codes

As the community pharmacist is well aware, the Maryland Medicaid Pharmacy Program (MMPP) performs a prospective drug utilization review (ProDUR) on each submitted claim. ProDUR alerts are designed to prevent and reduce adverse drug effects. They do so by identifying conflicts in drug therapy including therapeutic duplication, drug-drug interactions, and high doses. Claims can be overridden when the prescriber has been consulted, the pharmacist has reviewed the profile, or the pharmacist counsels the patient.

The MMPP relies on the pharmacist to use his or her best clinical judgment in determining when the prescriber should be consulted. The MMPP has recently evaluated therapeutic duplication of benzodiazepines since benzodiazepines can be overutilized. Benzodiazepines have known abuse potential and can impair physical and mental function. In evaluating override codes for therapeutic duplication of benzodiazepines, it was found that the majority of override codes indicated that the prescriber was consulted. Many of the claims for this class of drugs are perhaps being overridden, with the code indicating prescriber consult, even in cases where the prescriber may not have been consulted each and every time. Be advised that the MMPP counts on the pharmacist to use the intervention codes responsibly and to monitor their use by the pharmacy technical staff.

DUR Codes Reason for Service Codes (DUR Conflict Codes)

Code	Meaning
DA	Drug Allergy Alert
DD	Drug-Drug Interaction
ER	Overuse Precaution
HD	High Dose Alert
ID	Ingredient Duplication
LD	Low Dose Alert
MX	Excessive Duration Alert
PA	Drug Age Precaution
PG	Drug Pregnancy Alert
SX	Drug Gender Alert
TD	Therapeutic Duplication

Professional Service Codes (Intervention Codes)

MO	Prescriber Consulted
RO	Pharmacist Consulted
PO	Patient Consulted

National Provider Identifier (NPI) Information

Pharmacy NPI

Effective March 1, 2008, the point-of-sale claims processor for the following programs only accepts the pharmacy NPI number for billing:

Program	ACS BIN	PCN from Pharm to ACS	NCPDP group ID from Pharm
Maryland Medicaid (MA)	610084	DRMDPROD	MDMEDICAID
Kidney Disease Program (KDP)	610084	DRKDPROD	MDKDP
Maryland AIDS Drug Assistance Program (MADAP)	610084	DRAPPROD	MADAP
Breast & Cervical Cancer Diagnosis & Treatment Program (BCCDT)	610084	DRDTPROD	MDBCCDT

The processor does no longer accept the pharmacy NCPDP number, and claims submitted with the NCPDP number will be denied. The denial message will say “Non-matched pharmacy number.” If the pharmacy has yet to receive a NPI number from CMS, please view their website at <https://nppes.cms.hhs.gov/NPPES/Welcome.do>. The website provides information on obtaining an NPI number as well as a registry of assigned NPI numbers.

Prescriber NPI

Effective May 23, 2008 the prescriber NPI number will be required to submit pharmacy claims. The prescriber NPI number will replace the use of the DEA number. Prescriptions for controlled substances (Schedule II-V) must still bear the DEA number so as to comply with state and federal regulations. Claims for these prescriptions will be subject to additional verification by the point-of-sale processor to determine that the prescriber NPI number corresponds with a valid DEA number.

Pharmacy Briefs


Maryland Medicaid Pharmacy Program Website

The Maryland Medicaid Pharmacy Program has developed a website which contains information regarding the Pharmacy Program, including past issues of the Pharmacy Newsletter, links to Advisories, Transmittals, the Preferred Drug List, MCO Formularies and information regarding upcoming continuing education programs. The website can be viewed at www.marylandmedicaidpharmacyinformation.com.

DHMH E-mail "Advisory"

The Department of Health and Mental Hygiene Maryland Medicaid Pharmacy Program (MMPP) utilizes an e-mail notification service called an "Advisory" to give the pharmacy community important timely information. If you are currently not receiving e-mail Advisories through a pharmacy organization you belong to, please contact the MMPP representative at 410-767-1455.

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