

**Affected Programs:** BadgerCare Plus, Medicaid, SeniorCare

**To:** Blood Banks, Dentists, End-Stage Renal Disease Service Providers, Family Planning Clinics, Federally Qualified Health Centers, Nurse Practitioners, Pharmacies, Physician Assistants, Physician Clinics, Physicians, Podiatrists, Rural Health Clinics, HMOs and Other Managed Care Programs

## Changes to the Pharmacy Services Lock-In Program

Effective for dates of service on and after April 1, 2011, ForwardHealth will make changes to the Pharmacy Services Lock-In Program. Members enrolled in the Pharmacy Services Lock-In Program will be required to designate one Lock-In prescriber for most controlled substances, carisoprodol, and tramadol (i.e., restricted medications) and one Lock-In pharmacy where prescriptions for these medications must be filled.

### Overview of the Pharmacy Services Lock-In Program

The purpose of the Pharmacy Services Lock-In Program is to coordinate the provision of health care services for members who abuse or misuse Medicaid, BadgerCare Plus, or SeniorCare benefits by seeking duplicate or medically unnecessary services, particularly for controlled substances. The Pharmacy Services Lock-In Program focuses on the abuse or misuse of prescription benefits for controlled substances. Abuse or misuse is defined under Recipient Duties in DHS 104.02, Wis. Admin. Code.

The Pharmacy Services Lock-In Program applies to members in fee-for-service as well as members enrolled in Medicaid SSI HMOs and BadgerCare Plus HMOs. Members remain enrolled in the Pharmacy Services Lock-In Program for two years and are continuously monitored for their prescription drug usage. At the end of the two-year enrollment period, an assessment is made to determine if the

member should continue enrollment in the Pharmacy Services Lock-In Program.

Members currently enrolled in the Pharmacy Services Lock-In Program are locked into one pharmacy for the filling of *all* prescription medications and one physician for the provision of *all* medical services. Referrals are currently required for all services.

Effective for dates of service (DOS) on and after April 1, 2011, ForwardHealth will make changes to the Pharmacy Services Lock-In Program. Members enrolled in the Pharmacy Services Lock-In Program will be locked into one pharmacy where prescriptions for restricted medications must be filled and one prescriber who will prescribe restricted medications. Restricted medications are most controlled substances, carisoprodol, and tramadol. Referrals will be required only for restricted medication services.

Fee-for-service members enrolled in the Pharmacy Services Lock-In Program may now choose physicians and pharmacy providers from whom to receive prescriptions and medical services not related to restricted medications. Members will no longer be locked into one physician for the provision of all medical services. Members enrolled in an HMO must comply with the HMO's policies regarding care that is not related to restricted medications.

Prescribers, pharmacy providers, and members impacted by the changes to the Pharmacy Services Lock-In Program described in this *ForwardHealth Update* will be notified in separate direct mailings.

Providers may refer to Attachment 1 of this *Update* for a complete list of restricted medications that will be monitored by the Pharmacy Services Lock-In Program.

### **Excluded Drugs**

The following scheduled drugs will be excluded from monitoring by the Pharmacy Services Lock-In Program:

- Anabolic steroids.
- Barbiturates used for seizure control.
- Lyrica®.
- Provigil® and Nuvigil®.
- Weight loss drugs.

### **Designating a Lock-In Pharmacy and a Lock-In Prescriber for Restricted Medications**

Beginning in January 2011, fee-for-service members currently enrolled in the Pharmacy Services Lock-In Program will be required to designate one Lock-In prescriber to prescribe restricted medications. The member's current Lock-In pharmacy will continue to be the designated pharmacy where prescriptions for restricted medications must be filled. Members enrolled in an HMO are required to follow the policies of the HMO regarding designation of Lock-In prescribers for restricted medications. Members enrolled in an HMO should continue to visit their current Lock-In pharmacy to fill prescriptions for restricted medications.

Members enrolled in the Pharmacy Services Lock-In Program on and after April 1, 2011, will follow the process outlined in this *Update*.

Members enrolled in the Pharmacy Services Lock-In Program will no longer be required to designate one Lock-In pharmacy and one Lock-In provider for services not related to restricted medications.

Prescribers and pharmacy providers will be notified by letter that they have been designated by a member as his or her Lock-In prescriber or pharmacy provider for restricted medications.

Providers may choose not to participate in the Pharmacy Services Lock-In Program. If a provider chooses not to participate in the Pharmacy Services Lock-In Program, the Pharmacy Services Lock-In Program or the member's HMO will work with the member to designate a different Lock-In prescriber or Lock-In pharmacy.

If the member fails to designate Lock-In providers, the Pharmacy Services Lock-In Program or the member's HMO will choose for the member. During the member's enrollment in the Lock-In Program, the member may only receive prescriptions for restricted medications from the Lock-In prescriber and the Lock-In pharmacy unless a designation is in place for an alternate provider. Effective for DOS on and after April 1, 2011, Lock-In members without designated Lock-In providers will not be able to have prescriptions for restricted medications filled or reimbursed by ForwardHealth.

### **Pharmacy Services Lock-In Program Administrator**

The Pharmacy Services Lock-In Program is administered by Health Information Designs (HID). Health Information Designs may be contacted by telephone at (800) 225-6998, extension 3045, by fax at (800) 881-5573, or by mail at the following address:

Pharmacy Services Lock-In Program  
c/o Health Information Designs  
391 Industry Dr  
Auburn AL 36832

### **Pharmacy Services Lock-In Prescribers Are Required to Be Certified by Wisconsin Medicaid**

To prescribe restricted medications for Pharmacy Services Lock-In Program members, prescribers are required to be certified by Wisconsin Medicaid. Certification for the

Pharmacy Services Lock-In Program is *not* separate from certification by Wisconsin Medicaid. For information about certification, prescribers may refer to the Online Handbook on the ForwardHealth Portal at [www.forwardhealth.wi.gov/](http://www.forwardhealth.wi.gov/).

## **Role of the Lock-In Prescriber and Pharmacy Provider**

The Lock-In prescriber determines what restricted medications are medically necessary for the member, prescribes those medications using his or her professional discretion, and designates an alternate prescriber if needed. If the member requires an alternate prescriber to prescribe restricted medications, the primary prescriber should complete the revised Pharmacy Services Lock-In Program Designation of Alternate Prescriber for Restricted Medication Services form, F-11183 (12/10), and return it to the Pharmacy Services Lock-In Program and to the member's HMO, if applicable. Providers may refer to Attachment 2 for a copy of the revised form.

To coordinate the provision of medications, the Lock-In prescriber may also contact the Lock-In pharmacy to give the pharmacist(s) guidelines as to which medications should be filled for the member and from whom. The primary Lock-In prescriber should also coordinate the provision of medications with any other prescribers he or she has designated for the member.

The Lock-In pharmacy fills prescriptions for restricted medications that have been written by the member's Lock-In prescriber(s) and works with the Lock-In prescriber(s) to ensure the member's drug regimen is consistent with the overall care plan. The Lock-In pharmacy may fill prescriptions for medications from prescribers other than the Lock-In prescriber only for medications *not* on the list of restricted medications. If a pharmacy claim for a restricted medication is submitted from a provider who is not a designated Lock-In prescriber, the claim will be denied.

## **Alternate Providers for Members Enrolled in the Pharmacy Services Lock-In Program**

Members enrolled in the Pharmacy Services Lock-In Program do not have to visit their Lock-In prescriber to receive medical services unless an HMO requires a primary care visit. Members may see other providers to receive medical services; however, other providers cannot prescribe restricted medications for Pharmacy Services Lock-In Program members unless specifically designated to do so by the primary Lock-In prescriber. For example, if a member sees a cardiologist, the cardiologist may prescribe a statin for the member, but the cardiologist may not prescribe restricted medications unless he or she has been designated by the Lock-In prescriber as an alternate provider.

A referral to an alternate provider for a Pharmacy Services Lock-In Program member is necessary only when the member needs to obtain a prescription for a restricted medication from a provider other than his or her Lock-In prescriber or Lock-In pharmacy.

If the member requires alternate prescribers to prescribe restricted medications, the primary Lock-In prescriber is required to complete the Pharmacy Services Lock-In Program Designation of Alternate Prescriber for Restricted Medication Services form. Referrals for fee-for-service members must be on file with the Pharmacy Services Lock-In Program. Referrals for HMO members must be on file with the Pharmacy Service Lock-In Program and the member's HMO.

Designated alternate prescribers are required to be certified by Wisconsin Medicaid.

## **Claims from Providers Who Are Not Designated Pharmacy Services Lock-In Providers**

If the member brings a prescription for a restricted medication from a non-Lock-In prescriber to the designated Lock-In pharmacy, the pharmacy provider cannot fill the prescription.

If a pharmacy claim for a restricted medication is submitted from a provider who is not the designated Lock-In prescriber, alternate prescriber, Lock-In pharmacy, or alternate pharmacy, the claim will be denied. If a claim is denied because the prescription is not from a designated Lock-In prescriber, the Lock-In pharmacy provider cannot dispense the drug or collect a cash payment from the member because the service is a nonreimbursable service. However, the Lock-In pharmacy provider may contact the Lock-In prescriber to request a new prescription for the drug, if appropriate.

To determine if a provider is on file with the Pharmacy Services Lock-In Program, the Lock-In pharmacy provider may do one of the following:

- Speak to the member.
- Call HID.
- Call Provider Services at (800) 947-9627.
- Use the Portal at [www.forwardhealth.wi.gov/](http://www.forwardhealth.wi.gov/).

Claims are not reimbursable if the designated Lock-In prescriber, alternate Lock-In prescriber, Lock-In pharmacy, or alternate Lock-In pharmacy provider is not on file with the Pharmacy Services Lock-In Program.

## Exceptions

Certain exceptions will be made regarding Pharmacy Services Lock-In Program requirements. The following are exempt from Pharmacy Services Lock-In Program requirements:

- Out-of-state providers who are not certified by Wisconsin Medicaid.
- Administration of drugs during an emergency room visit.

If a member enrolled in the Pharmacy Services Lock-In Program presents a prescription for a restricted medication from an emergency room visit or an out-of-state provider, the pharmacist at the Lock-In pharmacy must attempt to contact the Lock-In prescriber to verify the appropriateness of filling the prescription. If the pharmacy provider is unable to contact the Lock-In prescriber, the pharmacist should use his or her professional judgment to determine whether or

not the prescription should be filled. If the prescription is filled, the claim must be submitted on paper using the Pharmacy Special Handling Request form, F-13074 (10/08).

The ForwardHealth emergency medication dispensing policy does not apply to the Pharmacy Services Lock-In Program. Drugs dispensed in an emergency to Pharmacy Services Lock-In Program members are nonreimbursable services except as noted above. Providers cannot collect payment from Pharmacy Services Lock-In Program members for nonreimbursable services.

## For More Information

Providers may refer to the Forms page of the Provider area of the Portal for copies of the Pharmacy Services Lock-In Program forms.

Providers may call HID with questions about the Pharmacy Services Lock-In Program. Pharmacy providers may also refer to the list of restricted medications data table on the Pharmacy page of the Portal or call Provider Services with questions about the following:

- Drugs that are restricted for Pharmacy Services Lock-In Program members.
- A member's enrollment in the Pharmacy Services Lock-In program.
- A member's designated Lock-In prescriber or Lock-In pharmacy.

The *ForwardHealth Update* is the first source of program policy and billing information for providers.

Wisconsin Medicaid, BadgerCare Plus, SeniorCare, and Wisconsin Chronic Disease Program are administered by the Division of Health Care Access and Accountability, Wisconsin Department of Health Services (DHS). The Wisconsin Well Woman Program is administered by the Division of Public Health, Wisconsin DHS.

For questions, call Provider Services at (800) 947-9627 or visit our Web site at [www.forwardhealth.wi.gov/](http://www.forwardhealth.wi.gov/).

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# ATTACHMENT 1

## Medications Monitored by the Pharmacy Services Lock-In Program

The table below lists all medications that are monitored by the Pharmacy Services Lock-In Program.

Drug Name	
alprazolam	lisdexamfetamine
amphetamine	lorazepam
buprenorphine	meperidine
butalbital	meprobamate
butorphanol	methadone
carisoprodol	methamphetamine
chloral hydrate	methylphenidate
chlordiazepoxide	midazolam
chlorpheniramine	morphine
clonazepam	nabilone
clorazepic acid	opium
cocaine	oxazepam
codeine	oxycodone
dexmethylphenidate	oxymorphone
dextroamphetamine	paregoric
diazepam	pentazocine
dihydrocodeine	pentobarbital
dronabinol	phenylephrine
estazolam	propoxyphene
eszopiclone	secobarbital
fentanyl	tapentadol
flurazepam	temazepam
hydrocodone	tramadol
hydromorphone	triazolam
isometheptene	zaleplon
ketamine	zolpidem
levorphanol	

# **ATTACHMENT 2**

## **Pharmacy Services Lock-In Program Designation of Alternate Prescriber for Restricted Medication Services**

(A copy of the “Pharmacy Services Lock-In Program Designation of Alternate Prescriber for Restricted Medication Services” is located on the following page.)

**FORWARDHEALTH  
PHARMACY SERVICES LOCK-IN PROGRAM  
DESIGNATION OF ALTERNATE PRESCRIBER FOR RESTRICTED MEDICATIONS SERVICES**

ForwardHealth requires certain information to authorize and pay for medical services provided to eligible members.

Members are required to give providers full, correct, and truthful information for the submission of correct and complete claims for reimbursement. This information should include, but is not limited to, information concerning enrollment status, accurate name, address, and member identification number (DHS 104.02[4], Wis. Admin. Code).

Under s. 49.45(4), Wis. Stats., personally identifiable information about applicants and members is confidential and is used for purposes directly related to program administration such as determining the eligibility of the applicant, processing prior authorization (PA) requests, or processing provider claims for reimbursement. Failure to supply the information requested by the form may result in denial of PA or payment for the services.

The use of this form is voluntary and providers may develop their own form as long as it includes all the information on this form and is formatted exactly like this form.

The designated Pharmacy Services Lock-In Prescriber for restricted medications should complete this form and submit it to the Pharmacy Services Lock-In Program by fax at (800) 881-5573 or by mail at the following address:

Pharmacy Services Lock-In Program  
Health Information Designs, Inc.  
391 Industry Dr  
Auburn AL 36832

The prescriber being referred to should also be provided with a copy of this form. If the member is enrolled in an HMO, the HMO must be provided with a copy of this form. Providers may contact the Pharmacy Services Lock-In Program at (800) 225-6998, extension 3045, with questions.

**Instructions:** Type or print clearly.

Name — Member (Last, First, Middle Initial)	Member Identification Number
Address — Member (Street, City, State, ZIP Code)	Date of Birth — Member
Name — Prescriber Being Referred (Last, First)	
National Provider Identifier (NPI) — Prescriber Being Referred	Telephone Number — Prescriber Being Referred
Address — Prescriber Being Referred (Street, City, State, ZIP+4 Code)	Begin and End Date of Referral
Reason for Referral and Type of Service to Be Rendered (Check One.)	
<input type="checkbox"/> A) IN ADDITION to the restricted medications I prescribe, the member needs treatment for another diagnosis from this designated prescriber.	
<input type="checkbox"/> B) AS AN ALTERNATE in my absence, the member may obtain restricted medications from this designated prescriber.	
The member named on this form requires restricted medications services in addition to those I provide. I am referring the member to the designated prescriber indicated on this form.	
Name — Designated Lock-In Prescriber (Print)	NPI — Designated Lock-In Prescriber
Telephone Number — Designated Lock-In Prescriber	Fax Number — Designated Lock-In Prescriber
<b>SIGNATURE</b> — Designated Lock-In Prescriber	Date Signed