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DEPARTMENT OF HUMAN SERVICES


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July 13, 2020

MEMORANDUM

MEMO NOS.
QI-2027
FFS 20-12

TO: Fee for Service (FFS) Providers and QUEST Integration (QI) Programs

FROM:  Judy Mohr Peterson, PhD
Med-QUEST Division Administrator

SUBJECT: REQUIRED QUANTITY PRESCRIBED FIELD IN POINT OF SALE CLAIM SUBMISSION FOR SCHEDULE II DRUGS

Effective September 21, 2020, all pharmacies are required to enter and submit the National Council for Prescription Drug Programs (NCPDP) Quantity Prescribed field (460-ET) for schedule II drugs Point of Sale (POS) submitted claims¹. The use of the Quantity Prescribed field in the POS system is intended to address the inability to identify a schedule II drug claim that is a partial or incremental fill versus a prescription refill:

- Identify fills dispensed as shortened days supply;
- Validate total quantity dispensed does not exceed quantity prescribed;
- Provide the information necessary to ensure that the prescribed schedule II drugs when dispensed do not exceed regulatory limitations.

¹ <https://www.govinfo.gov/content/pkg/FR-2020-01-24/pdf/2020-00551.pdf>

45 CFR Part 162 ADMINISTRATIVE REQUIREMENTS; § 162.1102 Standards for health care claims or equivalent encounter information transaction.

The Comprehensive Addiction and Recovery Act (CARA) of 2016, a federal act, expanded the circumstances in which a pharmacist may dispense less than the full prescribed quantity of schedule II drugs.² While some states do not allow, Hawaii allows by state law for inventory shortage of the prescribed schedule II drug as well as for a patient in a long-term care facility or with a medical diagnosis documenting a terminal illness. Use of the Quantity Prescribed field facilitates monitoring of schedule II drugs to be partially filled under these conditions and restrictions as defined in HRS 329-38(k)(1) and (3)³. The HRS link is in footnote 3 for your review.

For both the QI and the FFS programs, the POS Quantity Prescribed field will be mandatory only for schedule II drugs. The managed care plans should have system edits to deny or pend a claim if the Quantity Prescribed field is not submitted.

The FFS program will deny a claim with an error message if the field is not populated on the submitted claim. This does not change Med-QUEST Division's (MQD) existing policy that only one professional dispensing fee will be paid for the one written prescription for a 30-day supply of a drug. If the Department of Human Services (DHS) Form 204 is used for manual billing, please write "QUANTITY PRESCRIBED" in capital letters and the numeric quantity prescribed in the top right-hand corner. The claim will deny if the quantity prescribed is not on the submitted manual bill claim.

If you have any questions on the FFS program, please call the MQD Fiscal Agent (Conduent) Help Desk toll free at 1-877-439-0803. For policy questions, please contact Kathleen Kang-Kaulupali, Pharm.D., MQD Pharmacist, at kkang-kaulupali@dhs.hawaii.gov.

Signature: 
Email: jmohrpeterson@dhs.hawaii.gov

² <https://www.congress.gov/114/bills/s524/BILLS-114s524enr.pdf>

CARA; Title VII: Miscellaneous; Sec. 702

³ https://www.capitol.hawaii.gov/hrscurrent/Vol06_Ch0321-0344/HRS0329/HRS_0329-0038.htm
HRS 329-38(k)(1) and (3)