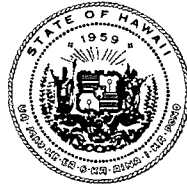


LINDA LINGLE  
GOVERNOR



LILLIAN B. KOLLER, ESQ.  
DIRECTOR

HENRY OLIVA  
DEPUTY DIRECTOR


STATE OF HAWAII  
DEPARTMENT OF HUMAN SERVICES  
Med-QUEST Division  
Medical Standards Branch  
P. O. Box 700190  
Kapolei, Hawaii 96709-0190

February 27, 2008

MEMORANDUM

ACS M07-13C  
(Continuation of ACS M07-13,  
ACS M07-13A and ACS M07-13B)

TO: Medicaid Physicians, Dentists, Physician Assistants, Advanced Practice Registered Nurses, Optometrists, Medicaid Participating Hospital Emergency Rooms, Other Providers with Prescribing Authority and Pharmacy Providers

FROM: Lois Lee, Acting Med-QUEST Division Administrator 

SUBJECT: FEE-FOR-SERVICE (FFS) PROGRAM ONLY

**TAMPER RESISTANT PRESCRIPTION PAD CLARIFICATION OF  
POPULATION COVERED AND RECOMMENDED FEATURES FOR  
HAWAII MEDICAID**

Effective **April 1, 2008**, the requirements for Tamper Resistant Prescription Pads<sup>1</sup> (TRPP) are defined as the following:

- All prescribers writing a prescription for Medicaid FFS recipients for medication claims to be reimbursed by Medicaid.
  - ❖ This applies whether Medicaid is the primary or the secondary payor (except for State funded programs).
  - ❖ For example, TRPP must be used for prescriptions being filled for the dual eligibles. Medicare Part B as the primary payor and Medicaid as the secondary payor.
- **All drugs prescribed in writing by dentists for QUEST recipients** because these claims are reimbursed by Medicaid FFS.

---

<sup>1</sup>Section 7002 (b) amends 1903b(i) of the Social Security Act 42 USC193b(i), by adding a new paragraph (23), which states that payment shall not be made for...“amounts expended for medical assistance for covered outpatient drugs [as defined in section 1927(k)(2)] for which the prescription was executed in written (and non-electronic) form unless the prescription was executed on tamper-resistant pad.”

**“CII” drugs require a paper prescription.**

If not on TRPP, the pharmacist shall obtain:

- A prescription that is on tamper-resistant paper; or
- An appropriate telephonic confirmation of the prescription from the prescriber; or
- A faxed confirmation of the prescription from the prescriber.

<b>Prescription Type</b>	<b>CHANGES In CMS Requirement for Medicaid Reimbursement</b>	<b>Effective Date</b>
<b>Handwritten</b>	<b>Must be written on a tamper-resistant prescription pad, which contains all three (3) of the CMS and industry-recognized safety features.</b>	<b>October 1, 2008</b>

---

**National Provider Identifier (NPI)**

**A friendly reminder: NPI is required by CMS, on all pharmacy claims effective May 23, 2008.**

If you have questions regarding Medicaid drug claims processing, please contact the ACS PBM Call Center at 1 (877) 439-0803.

Attachment

- TRPP must be used for all drugs: Over-the-counter (OTC), non-controlled and controlled.
- An emergency fill can be dispensed if the prescription is written on non-TRPP, as long as the prescriber provides a faxed, electronic, oral/telephone or compliant written prescription on TRPP within 72 hours after the date on which the prescription was filled. In an emergency situation, this allows a pharmacy to telephone a prescriber to obtain a verbal order for a prescription written on a non-compliant prescription pad.
- **The TRPP must have at least one (1) of the three (3) categories of industry-recognized safety features<sup>2</sup>** as required by the Centers for Medicare and Medicaid Services (CMS).
- After reviewing recent recommendations from the National Council for Prescription Drug Programs (NCPDP), the Med-QUEST Division (MQD) has recommended **basic** features for TRPP in **Table 1**.
- There is no single specific format, size or color for the TRPP. Additional expensive safety features such as unique batch numbers, holograms or paper toner fusion, etc., may be used.

Please direct printers that may contact you to the home page of the MQD website at [www.himed-questffs.org](http://www.himed-questffs.org) for the minimum requirements and the MQD's recommendations for TRPP.

On **October 1, 2008**, the CMS requirements for TRPP will change to the following: **All three (3)** of the industry-recognized categories of safety features listed in Table 1 are to be contained on the TRPP<sup>2</sup>.

Reminder:

Prescription Type	NO CHANGE
Oral/Telephone	
Faxed	<ul style="list-style-type: none"> <li>• Should be written on NON-tamper-resistant prescription paper.</li> <li>• Should contain the name of the receiving pharmacy.</li> </ul>
Electronic (e-prescription)	
Handwritten	<ul style="list-style-type: none"> <li>• When a QUEST (managed care) plan is the payor. (Note: drugs prescribed by a dentist for QUEST recipients are NOT paid by the QUEST plans.)</li> <li>• 100% State funds; i.e., State Pharmacy Assistance Program (SPAP) or Contingency Plan.</li> </ul>
Refills	When the prescription was originally filled prior to April 1, 2008 and refills are obtained on or after April 1, 2008.

<sup>2</sup>The Centers for Medicare and Medicaid Services (CMS) letter to State Medicaid Directors (SMDL #07-012, 08/17/07).

**Table 1**

<b>Required Tamper-Resistant Categories or Features</b>	<b>Med-QUEST Division Recommendations</b> (Include but are not limited to the following one or more of the industry-recognized features <sup>3</sup> )
1. Unauthorized copying of a completed or blank prescription form:	<p><b>“VOID” pantograph:</b>                      The word “VOID” appears on the document when the prescription is photocopied.</p>
2. Erasure or modification of information written on the prescription by the prescriber: <ul style="list-style-type: none"> <li>• Any one of a, b, or c can be used.</li> <li>• Or any combination of a, b, or c can be used.</li> </ul>	<p>a. <b>Uniform non-white background color:</b></p> <ul style="list-style-type: none"> <li>• The background must consist of a solid color or consistent pattern that has been printed onto the paper.</li> <li>• If someone tries to erase or copy, the consistent background color will look altered and show the color of the underlying paper.</li> </ul> <p>b. <b>Quantity check off boxes:</b></p> <ul style="list-style-type: none"> <li>• In addition to the written quantity on the prescription, quantities are indicated in ranges.</li> <li>• It is recommended that ranges be in multiples of 25’s with the highest being “151 and over”.</li> <li>• The range box corresponding to the quantity prescribed MUST be checked for the prescription to be valid.</li> </ul> <p>c. <b>The Refill Indicator:</b></p> <ul style="list-style-type: none"> <li>• This indicates the number of refills on the prescription and requires a circle or check of the number of refills or “NR”.</li> <li>• The refill numbers must be used to be a valid prescription.</li> </ul>
3. Use of counterfeit prescription forms:	<p><b>Security features and descriptions listed on prescriptions:</b>                      A complete list of the industry-recognized features is printed on the prescription paper to aid the pharmacists’ identification of security features implemented on the TRPP.</p>

See the illustration in Appendix A. There is no single specific format, size or color for the security prescription forms. Additional expensive safety features such as unique batch numbers, holograms or paper toner fusion, etc., may be used.

<sup>3</sup>The National Council for Prescription Drug Programs (NCPDP) letter to State Medicaid Directors (dated February 1, 2008).

# Appendix A

## Sample Tamper-Resistant Prescription Pad With Recommended Features

