Division of Health Care Access and Accountability F-00842 (07/13)

FORWARDHEALTH PHARMACY SERVICES LOCK-IN PROGRAM PROGRAM SUMMARY

FOR HMO USE ONLY

Pharmacy Services Lock-In Program Background

The Pharmacy Services Lock-In Program is part of the ForwardHealth Retrospective Drug Utilization Review (DUR) Program. Under the Retrospective DUR Program, ForwardHealth routinely reviews pharmacy claims using DUR Board-approved criteria to identify potential drug problems (e.g., drug-drug interactions, overuse, drug-disease contraindications). When problems are identified, intervention letters may be sent to prescribers and members.

The purpose of the Pharmacy Services Lock-In Program is to coordinate the provision of *restricted medications* for ForwardHealth members who have been identified through retrospective DUR or other means (e.g., physicians, pharmacists, other providers) as abusing or misusing Medicaid services for restricted medications (i.e., most Schedule II, III, IV, and V controlled substances). A current list of restricted medications can be found on the Pharmacy Resources page of the Providers area of the ForwardHealth Portal at *www.forwardhealth.wi.gov/WIPortal/content/provider/medicaid/pharmacy/resources.htm.spage*.

Members who fail to modify their use of restricted medications, despite intervention attempts, may be placed in the Pharmacy Services Lock-In Program. The member is assigned one lock-in pharmacy, where prescriptions for restricted medications must be filled, and one or more lock-in prescribers, who will be allowed to prescribe restricted medications.

ForwardHealth will only cover restricted medications for the member when they are ordered by the lock-in prescriber(s) and filled at the lock-in pharmacy.

Members remain in the Pharmacy Services Lock-In Program for two years. During this lock-in period, they continue to be monitored through the Retrospective DUR Program.

Note: The Pharmacy Services Lock-In Program only limits a member's access to restricted medications that are being submitted to ForwardHealth for payment.

A member placed in the Pharmacy Services Lock-In Program has the right to request a hearing before an administrative law judge of the Division of Hearings and Appeals (DHA).

Once placed in the Pharmacy Services Lock-In Program, a member's enrollment information on file with ForwardHealth will be changed to reflect his or her lock-in information and assignments (i.e., effective date and end date of the lock-in, lock-in pharmacy, primary prescriber, and alternate prescribers [if applicable]). The lock-in information and assignments are accessible via Enrollment Verification on the Portal.

HMO Member Referral for Pharmacy Services Lock-In Program

HMOs may refer members for the Pharmacy Services Lock-In Program. Members referred for lock-in by their HMO will be directly placed in the Pharmacy Services Lock-In Program. No intervention letters will be sent.

In order to refer members for the Pharmacy Services Lock-In Program, at least one of the following must be documented by the HMO:

- There is evidence that the member intentionally provided incorrect information to a provider to obtain restricted medications (e.g., incorrect information about ForwardHealth eligibility status or medical history).
- The member was convicted of a crime related to restricted medications within the past year (e.g., forgery, theft, distribution).
- The member had **two or more** occurrences within a six-month period of violating a pain contract with the same prescriber or with different prescribers. A prescriber must agree to continue managing the member after the lock-in has been initiated.
- The member had any combination of **four or more** medical appointments, urgent care visits, or emergency room visits within a 14-day period at which he or she was seeking a restricted medication as the primary reason for the visit.
- The member required an emergency room visit or hospitalization in the last 90 days due to a suicide attempt, poisoning, or overdose from the use of a restricted medication(s).

Note: For detailed information about the HMO Lock-In Coordinator's responsibilities when making a referral, see the HMO Responsibilities for Member Referral to Pharmacy Services Lock-In Program form, F-00840, which is located on the Forms page of the ForwardHealth Portal at https://www.forwardhealth.wi.gov/WIPortal/content/provider/forms/index.htm.spage.

HMOs are responsible for preparing all documentation and acting as the Department of Health Care Access and Accountability representative for member appeals to the DHA related to a member's referral for the Pharmacy Services Lock-In Program.

HMO Request for a Selected Review of Member Prescription Drug Use

HMOs not wishing to refer a member to the Pharmacy Services Lock-In Program, yet concerned about the member's abuse or misuse of restricted medications, may request a selected review of the member's paid pharmacy claims. To request a selected review, HMOs should complete and submit the Pharmacy Services Lock-In Program Request for Review of Member Prescription Drug Use form, F-00250.

Not all selected review requests will result in an intervention letter or the member's placement in the Pharmacy Services Lock-In Program.