District of Columbia Pharmacy Benefit Manager Services (PBMS) Fee-for- Service (FFS) Provider Manual

Version 7.0

October 7, 2026.

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Revision History

Version	Date	Name	Comments
1.0		Implementation	Initial creation
2.0	11/16/2015	DHCF	Change of PBM Vendor
3.0	04/19/2018	DHCF	See summary of changes listed below: • Long-term Care • 340B Program • Diabetic Supplies • Mental Health • Dispensing Fee • Pricing Methodology • Pricing Disputes • Pharmacy Lock-in Program • Signature Log Requirements • Medicare Part B and D • POS Notice to Beneficiaries • Frequently Asked Questions • DC Healthcare Alliance Replenishment Program terminated on April 30, 2016. • ADAP Warehouse Program terminated on October 14, 2016.
4.0	08/30/2021	DHCF	See summary of changes listed below: • Dispense as Written Codes (DAW) • Vaccines • Death with Dignity • Medical Benefit Drugs
5.0	08/09/2023	DHCF	See summary of changes listed below: • OTC List (naloxone) • Vaccines • Physician Administered Drugs • Newborn coverage • Hepatitis C coverage • MAT drug products • PDMP • Counseling • Signature Log Requirements • Audits and recordkeeping

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6.0	12/31/2024	DHCF	See summary of changes • Vaccines • Physician Administered Drugs • Quantity limit • DAW • Excluded Class • MAT drug products • MME • Beneficiary Notice forms • Pricing Disputes
7.0	11/30/2025	DHCF	• Alliance ICP Program • VFC
8.0	10/30/2026	DHCF	• Copay Changes • Specialty Pharmacy application

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1.0 Introduction

As of December 19, 2015, Prime Therapeutics State Government Solutions LLC processes claims on behalf of the District of Columbia's Department of Healthcare Finance (DHCF) Medicaid Pharmacy Program (hereafter referred to as the "District"). **All claims must be submitted using the National Council for Prescription Drug Programs (NCPDP) Version D.0 Claim format as mandated by Health Insurance Portability and Accountability Act (HIPAA) on January 1, 2012. DHCF will accept the B1, B2, B3, and E1 transactions in the NCPDP D.0 format; no other transactions will be accepted.**

The hyperlink for the Payer Specification document is provided in *Section 14.1 – Appendix A: District D.0 Payer Specification*. Please make note of the Bank Identification Number (BIN), Processor Control Number (PCN), and Group Identification (ID) needed to submit a claim to the Prime Therapeutics State Government Solutions Pharmacy Drug Claim system, FirstRx℠.

FirstRx℠ allows providers access to recipient eligibility, pricing, drug coverage, Prospective Drug Utilization Review (ProDUR), and payment information at the Point-of-Sale (POS).

Pharmacy providers must be enrolled with DHCF Medicaid at the time of claim submission in order to be reimbursed.

This provider manual will address the Medicaid Fee-for-Service (FFS) program rules. If you have questions about the information presented in this manual, contact the District's Medicaid Provider Help Desk at 1-800-273-4962.

1.1 Help Desk Contact Information

- **Provider Help Desk**: 1-800-273-4962
- **Beneficiary Help Desk**: 1-800-272-9679 (*Language Assistance Services are available.*)
- **Clinical Prior Authorization Fax**: 1-866-653-1431
- **Hearing Impaired**: 711

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2.0 Program Information

2.1 Claim Processing Information

District pharmacy providers will be required to submit claims using the following information:

BIN:	018407
PCN:	DCMC018407
Group ID:	DCMEDICAID

2.2 Timely Filing

Pharmacies have 365 days from the first Date of Service (DOS) to submit an original claim and perform a re-bill.

- The timely filing rules apply to POS.
- Paper claims will not be accepted.
- Timely filing overrides will be considered for the following situations:
  - Retroactive eligibility
  - Third-Party Liability (TPL) delay

2.3 Refills

- All refills must be dispensed in accordance with District and Federal requirements.
- Refill prescriptions must be dispensed in accordance with the orders of the physician but no more than 12 months from the date written.
- Auto refills are not allowed.
- CIIs (DEA code = II) must be filled within 30 days of being written.
- CIIs partial fills are allowed according to DCMR § 48-903.08 and Code of Federal Regulations, 21 C.F.R. § 1306.13.
- CII incremental fills, where less than the full amount prescribed is dispensed to the member, can support government regulatory requirements that are intended to help curtail the opioid crisis.
  - Incremental fill quantity should be submitted in the Quantity Prescribed field (NCPDP Field #460-ET).
- If the pharmacist is unable to supply the full quantity for a written or emergency oral prescription of CII, the remaining portion of the prescription may be filled within seventy-two (72) hours.
- A prescription for Schedule II controlled substance for a patient in a long-term care facility (LTCF) or for a patient with a medical diagnosis documenting a terminal illness may be filled in partial quantities to include individual dosage units and in accordance with federal law. If there is any question whether a patient may be classified as having a terminal illness, the pharmacist must document contact with the practitioner prior to partially filling the prescription.

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- **Controlled drugs other than CIIs** (Drug Enforcement Agency [DEA] code = III, IV, V) may be refilled in accordance with the physician's orders, up to five refills (plus one original) or six months, whichever comes first.
- **Non-Controlled drugs** (DEA code = 0) may be refilled in accordance with the physician's orders, up to 11 refills (plus one original) or one year, whichever comes first.

2.4 Pricing

Refer to the DC Medicaid Payer Sheet.

2.4.1 Pricing Methodology

Claims processed for the District's FFS Pharmacy Program will be priced at the lesser of the following:

- National Average Acquisition Cost (NADAC);
- Wholesale Acquisition Cost ([WAC] + 0 percent);
- District Maximum Allowable Cost (DMAC);
- Usual and Customary (U&C); and
- Federal Upper Limit (FUL) Pricing.

2.4.2 Pricing Disputes

- National Average Drug Acquisition Cost (NADAC) Disputes
  - Centers for Medicare & Medicaid Services (CMS), through its third-party contractor, has established a procedure to address pharmacy concerns about individual price discrepancies found in the weekly NADAC file. https://www.medicaid.gov/medicaid/prescription-drugs/retail-price-survey/index.html
  - To dispute NADAC pricing, pharmacies can complete a Request for Medicaid Reimbursement Review Form to be submitted to CMS.
  - CMS will determine whether to adjust prices in the next weekly NADAC price file release, if necessary.
- Federal Upper Limit (FUL) Disputes
  - For questions or concerns related to the FUL program or pricing data associated, please e-mail FUL@cms.hhs.gov.
    - Maximum Allowable Cost (MAC) Disputes
      - MAC Weekly Price Updates
      - MAC Price Research Request Form

2.4.3 Dispensing Fees

Dispensing fees take into account additional providers costs (e.g., overhead, a pharmacist's time in checking the computer for information about an individual's coverage, performing drug utilization review

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and preferred drug list review activities, packaging, etc.). The dispensing fee for the FFS Medicaid program is $11.15 per claim.

2.4.4 Co-pay

Effective October 1st 2026, all prescriptions have a zero Copay. **Pharmacy providers must not charge copays to Medicaid beneficiaries** for covered prescription and over-the-counter (OTC) medications.

2.5 Generic Mandatory

The District Medicaid FFS program is a "Generic Mandatory" program. Claims submitted for a brand product that has an AB-rated generic equivalent product available will deny with a message informing the pharmacy to use a generic medication.

Exceptions to this rule include the following:

- Preferred brand drugs identified on the preferred drug list (PDL);
- Claims for which the prescriber has written "Brand Medically Necessary" on the prescription and the provider has received a PA from the District Medicaid Pharmacy Call Center; (the pharmacy must submit a DAW 1 on the claim); and
- Claims for which no generic product is available in the marketplace; (the pharmacy must submit a DAW 8 on the claim).

2.6 Dispense As Written (DAW) Codes

Effective April 1, 2021, the District will only allow providers to claim Medicaid reimbursement using designated DAW codes deemed acceptable to the DC Medicaid Pharmacy program, with abbreviated explanations that align with the National Council on Prescription Drug Programs (NCPDP) claims' transactions field descriptions. In order to receive reimbursement for claims submitted, DC Medicaid Pharmacy Providers shall utilize the correct DAW codes based upon the information provided on a prescription and/or verbally verified (documented on the prescription for audit purposes) from the prescriber or their designee.

See DHCF Transmittal 21-12: Acceptable Dispense As Written (DAW) Codes for Submitted Pharmacy Claims.

The following codes are considered **acceptable** for the purposes of claiming for DC Medicaid reimbursement:

- **For Medication-Assisted Treatment (MAT) Drug Products**
  - **DAW – 0:** Substitution Allowed — No Product Selection Indicated
  - **DAW – 1:** Substitution Not Allowed by Prescriber — Brand Drug Dispensed

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  - **DAW – 4:** Substitution Allowed — Generic Drug Not in Stock at Pharmacy — Brand Drug Dispensed
  - **DAW – 8:** Substitution Allowed — Generic Drug Not Available in Marketplace — Brand Drug Dispensed
- **For All Other Prescribed Drugs**
  - **DAW – 0:** Substitution Allowed — No Product Selection Indicated
  - **DAW – 1:** Substitution Not Allowed by Prescriber — Brand Drug Dispensed *Medical Necessity Must Be Established*
  - **DAW – 6:** Override Preferred Brand
  -
  - **DAW – 8:** Substitution Allowed — Generic Drug Not Available in Marketplace — Brand Drug Dispensed
  - **DAW – 9:** Substitution Allowed — Insurance Plan Request Brand Drug — Brand Drug Dispensed

The following codes are considered **unacceptable** for billing for the DC Medicaid Program:

- **For Any Prescribed Drug**
  - **DAW – 2:** Substitution Allowed — Patient Requested that Brand Product be Dispensed
  - **DAW – 3:** Substitution Allowed — Pharmacist Selected Product Dispensed
  - **DAW – 5:** Substitution Allowed — Brand Drug Dispensed as Generic
  - **DAW – 7:** Substitution Not Allowed — Brand Drug Mandated by Law

2.7 Prospective Drug Utilization Review (ProDUR)

The District POS system will enforce a comprehensive ProDUR program. The system will automatically review each drug claim submitted by a pharmacist (prior to dispensing) to identify problems such as drug-drug interactions, therapeutic duplication, and incorrect dosage.

The pharmacy will receive a message back to identify any of the following potential problems with submitted claims:

- Drug – Drug Interaction;
- Drug – Disease Contraindication;
- Therapeutic Duplication;
- Ingredient Duplication;
- Pediatric Drug;
- Early Refill;
- Low Dose;
- High Dose; and
- Geriatric Drug.

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Any claim submitted that poses a potential DUR problem will either deny and require pharmacy overrides or pay with a message returned on the response alerting the pharmacist to the potential problem.

The ProDUR exceptions that will result in a **denial** and require prior authorization are the following:

- Drug-Drug interaction with severity level 1;
- Therapeutic Duplication for CII controlled substances; and
- Early Refill.

2.8 Coordination of Benefits (COB)

District Medicaid is the payer of last resort; therefore, there are special rules in place when processing claims for District recipients who are covered by other insurance.

- Claims must always be submitted to the primary carrier prior to being submitted to the District for processing.
- If the beneficiary has other coverage on their recipient file and the claim does not include an Other Coverage Code of 2 or 4, indicating the claim has been sent to the primary payer for processing, the claim will deny with an NCPDP Reject code of *41 – Submit Claim to Other Processor*.
- The District will always use the District Medicaid program-allowed amount when calculating reimbursement. If a third party's payment exceeds this amount, a zero paid amount from the District can result.
- In accordance with regulations at 42 CFR § 447.15, providers may not balance bill Medicaid beneficiaries amounts additional to the amount paid by the agency plus any deductible, coinsurance or copayment required by the state plan to be paid by the beneficiary.

2.8.1 Medicare Part B

By law, all other available third-party resources must meet their legal obligation to pay claims before the Medicaid program pays for the care of an individual eligible for Medicaid. See Coordination of Benefits & Third-Party Liability.

Coordination of benefits (COB) for Medicare Part B services must be submitted as a Medicaid medical benefit and cannot be processed at point of sale.

Please use form CMS 1500 to submit the claims to the medical benefit. Claims should be sent to the following address:

CMS 1500 Claim Forms
P.O. Box 34768
Washington, DC 20043-4768

See https://medicaid.dc.gov/ for details.

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- Part B pricing logic is available at: Crossover Pricing Logic.
- Providers must accept assignment for Part B drugs coordination of benefits with Medicaid. Dual eligible beneficiaries should never be asked any additional payments for Part B drugs.
  - For more information, refer to CMS bulletin at: Prohibition Billing Dually Eligible Individuals Enrolled in the Qualified Medicare Beneficiary (QMB) Program.

2.8.2 Medicare Part D

By federal guidelines, the District Medicaid program does not process COB for Medicare Part D claims as it does for all other COB claims. The claim must be sent to Medicare Part D to be paid. Some over-the-counter (OTC) drugs not covered by Medicare Part D that are routinely covered by Medicaid may be reimbursed.

Please refer to OTC list in section 3.4.

2.9 Pharmacy Lock-in Program

District Medicaid has a Pharmacy Lock-In Program that is designed to detect and prevent abuse or misuse of the Medicaid pharmacy benefit, as defined by specific criteria, restricting beneficiaries to one (1) specific pharmacy for a defined period of twelve (12) months. Protecting the beneficiary's safety is the ultimate reason for placement in Pharmacy Lock-In Program.

- DHCF will use the following guidelines established by the DUR Board to identify beneficiaries within the last ninety (90) days:
  - Three (3) or more controlled substance prescriptions per month; and/or
  - Three (3) or more prescribers for controlled substance prescriptions per month; and/or
  - Three (3) or more pharmacies for controlled substance prescriptions per month; and/or
  - Ten (10) or more prescriptions per month.

District Medicaid beneficiaries are notified thirty (30) days in advance regarding placement in the Pharmacy Lock-In Program. The initial letter provides the beneficiary an option to select amongst three (3) frequented pharmacies to choose as his/her designated pharmacy. This selection must be made within fifteen (15) days from the date of the initial letter. If the beneficiary does not make a selection, the beneficiary will be assigned a designated pharmacy.

A confirmation letter is mailed to the beneficiary that lists the designated lock-in pharmacy and the effective start and end date of the Pharmacy Lock-In Program. DHCF will notify all prescribers of the controlled substance prescriptions and the designated lock- in pharmacy in writing.

The lock-in pharmacy will be designated to fill all of the beneficiary's DC Medicaid-covered prescriptions. If a non-designated lock-in pharmacy submits a prescription claim for a beneficiary, the pharmacy will receive an error message**: "NCPDP reject code *50 – Non matched pharmacy number. Pharmacy Not Authorized – Beneficiary is in a Pharmacy Lock-in Program."***

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3.0 Drug Coverage

3.1 Preferred Drug List (PDL)

The District uses a PDL in determining coverage of specific drugs or drug classes. The PDL will be located on the DHCF pharmacy benefit website at http://www.dc- pbm.com/provider/documents. Claims submitted for drugs that are non-preferred will receive an NCPDP Reject code of *75 – PDL PA Required*.

Refer to the Preferred Drug Program PA Form.

Only drugs that are part of the listed Therapeutic Drug Classes are included on the Medicaid Preferred Drug List (PDL). Therapeutic Drug Classes are reviewed annually at one of four quarterly Pharmacy and Therapeutic Committee meetings. These meetings are generally held the first Thursday of March, June, September, and December.

Therapeutic Drug Classes on the PDL may be subdivided, for example by pharmacologic class or route of administration, Divided classes include Acne Agents, Antipsychotics, Ophthalmic Anti-Inflammatories, Glaucoma agents, PAH Agents, etc. Any Therapeutic Drugs Classes not listed are not part of the PDL but will continue to be covered for Washington DC Medicaid Fee for service members.

3.1.1 PDL Prior Authorization Override

Providers can override the PA requirement for a non-preferred drug by entering “3” (emergency) in the Level of Service field (NCPDP Field # 418-DI). The following restrictions will apply:

- The claim must be for a 3-day supply except where the package must be dispensed intact;
- Covered drugs only; and
- A patient is allowed one PDL PA override per Generic Sequence Number (GSN) per 30 days.

3.1.2 Seventy-two Hour (3-days) Emergency Supply Override

- Information for Pharmacy Providers on dispensing a 72-hour (3-day) emergency supply
  - The rule applies to any submitted pharmacy drug claim that results in a NCPDP Reject Code: 75 “Prior Authorization (PA) Required” and any drug(s) that is affected by clinical or PA edits and requires prior approval.
  - If the prescriber cannot be reached or is unable to request the PA, the pharmacy should submit an emergency 72-hour claim.
  - Pharmacist should use his/her professional judgment regarding whether there is an immediate need every time the 72-hour option is used.
  - The 72-hour emergency procedure should not be used for routine and continuous overrides.
  - If the medication is a dosage form that prevents a 3-day supply from being dispensed, it is still permissible to indicate that the emergency prescription is a 3- day supply, and enter the full quantity dispensed. Dispense the minimum quantity as a 3-day supply. Examples include, but

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are not limited to, multiple-dose injectables, metered-dose inhalers, nasal sprays, topical preparations and powders for reconstitution.

  - Pharmacy claims requiring a PA will reject with the following code and messaging:

- 75 – Prior Authorization Required. Inform the Medicaid beneficiary, notify the prescriber that a PA is required, and contact the Pharmacy Benefit Manager (PBM) if needed. Follow the instructions in the PA error message and submit the indicated PA Type Code, Submission Clarification Code, and/or PA Auth Code if needed to obtain a paid claim for the 3-day emergency supply.

3.2 Human Immunodeficiency Virus (HIV)/ Acquired Immune Deficiency Syndrome (AIDS) Drug Coverage

3.2.1 HIV/AIDS Drug Benefit

Human Immunodeficiency Virus (HIV)/Acquired Immune Deficiency Syndrome (AIDS) medications are a benefit of the DC Medicaid FFS Pharmacy Program.

Bill using FFS BIN/PCN combination

BIN:	018407
PCN:	DCMC018407

For beneficiaries in LTC facilities, claims will be allowed for HIV/AIDS drugs within AHFS 081808.

3.2.2 Treatment

As of January 1, 2013, DC Healthy Family beneficiaries actively enrolled in a Medicaid Managed Care Organization (MCO) receive their HIV/AIDS medications from the FFS Medicaid program. Alliance members receive HIV/AIDS drug coverage benefits from the AIDS Drug Assistance Program (ADAP) Program. For details, please visit the ADAP Program.

3.2.3 PrEP and PEP Coverage

Effective April 1, 2021, all providers and pharmacies submitting Medicaid pharmacy point- of-sale (POS) claims for FDA-approved ARV drugs used for Pre-Exposure Prophylaxis (PrEP) or Post-Exposure Prophylaxis (PEP) must bill through the Fee for Service (FFS) Medicaid Pharmacy Benefit Manager (currently Prime Therapeutics) to receive reimbursement from DHCF. This policy applies to all pharmacy claims submitted on behalf of eligible Medicaid beneficiaries, with the exception of members of the Alliance program. Alliance or Immigrant Children's Program (ICP) members should receive PrEP and PEP ARV drugs from their respective MCOs. **See DHCF Transmittal 23-22. Antiretroviral (ARV) Drug Coverage Clarification.**

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3.3 Excluded Drugs/Supplies

The following drugs are excluded from coverage for the District DHCF Pharmacy Program:

- Drugs that are considered Drug Efficacy Study Implementation (DESI) drugs (classification codes 5/6);
- Investigational drugs;
- Drugs that do not have a signed federal rebate agreement on file with CMS;
- Drugs that are obsolete – drugs are considered obsolete if the date of service is 366 days or greater than the obsolete date reported by First Databank;
- Food supplements;
- Medical supplies (excluding syringes);
- Anti-obesity drugs;
- Drugs for cosmetic purposes (unless determined to be medically necessary);
- Diagnostic agents;
- Erectile dysfunction drugs; and
- Non-Prescription cough and cold.
- COVID Test kits effective October 1, 2025.

3.4 Covered Over-The-Counter (OTC) Medications

- The following categories of over-the-counter OTC medications shall only be covered when prescribed by a licensed provider:
  - Acetaminophen;
  - Antacids;
  - Aspirin;
  - Bowel diagnostic preparation kits;
  - Calcium;
  - Ferrous sulfate;
  - Ferrous gluconate;
  - Geriatric vitamins;
  - Ibuprofen (200 mg strength);
  - Identified diabetic supplies (Section 3.7 – Diabetic Supplies);
  - Insulin;
  - Narcan 4 mg (naloxone hydrochloride) nasal spray for OTC use;
  - Pediatric vitamins;
  - Prenatal vitamins;
  - Single-agent vit. B1, vit. B6, vit. B12, vit. D;
  - Salicylate;

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- Single-ingredient antihistamines;
- Family-planning products;
- Syringes and needles;
- Selected gastrointestinal products (senna leaf extract);
- Sodium bicarbonate 325 mg up to 650 mg; and
- Folic acid 400 mcg up to 800 mcg.

3.5 Unit Dose

Unit-dose packaged drugs will deny for retail prescriptions — with the exception of the drugs that are only available in unit-dose form.

LTC prescriptions will allow payment for all unit-dose drugs as identified by First Databank.

3.6 Overrides for Vacation Supply, Stolen, or Lost Medication

Under normal circumstances, and in the absence of justifying reasons, a request for a refill too soon after previous fill is denied if a participant does not utilize at least 80 percent (i.e., 24th day of the 31-day supply) of the previous prescription.

Any request for a refill too soon after previous fill — to be overridden for travel purposes or due to stolen or lost medication — should be faxed to 1-866-535-7622 using the Travel Medication/Supply Form. The Pharmacy Benefit Management (PBM) agent or DHCF staff will communicate with a pharmacy provider to process claims for approved requests.

3.6.1 Travel/Vacation Supply

A physician can submit a request for a refill too soon after previous fill override for a patient's vacation, emergency, or work-related business travel purposes before the next refill time. The following documents should accompany the request for an override:

- A copy of the prescription for the medication requested;
- A copy of the round-trip travel itinerary; and
- A letter from the physician justifying the need.

The request for a vacation override should be submitted at least seven days prior to the intended day of travel to accommodate a review, which will take approximately two business days.

The quantity requested cannot exceed a 90-day supply. A maximum of one 90-day supply will be authorized per 365-day period with certain exceptions. Refer to the Travel Medication/Supply Form.

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3.6.2 Stolen or Lost Medication

A request for a refill too soon after previous fill, due to lost or stolen medication, may be approved when there are acceptable reasons or when a patient produces evidence, such as a police report.

3.7 Vaccines

Immunizations and vaccines will be covered at POS per state regulations found at Administration of Immunizations and Vaccinations by Pharmacists DCMR Title 17, Chapter 65, Section 6512. An administration fee will be paid instead of a dispensing fee.

- Current District of Columbia Board of Pharmacy regulations allow registered pharmacists, who are certified by the Board of Pharmacy, to administer limited immunizations and vaccinations to any person aged twelve (12) and older — with parental consent or valid identification if eighteen (18) or older.
  - The protocol is expressly limited to only the following types of vaccinations:
    - Hepatitis;
    - Shingles;
    - Human Papillomavirus;
    - Tetanus;
    - Tdap;
    - Meningococcal;
    - Haemophilus influenzae; and
    - pneumococcal and influenza vaccinations, including, but not limited to, H1N1 and other epidemic vaccinations, which are currently called for by the World Health Organization or the Center for Disease Control and Prevention at the time of the vaccination.
    - COVID 19 Vaccines
- Prior authorization will be required for beneficiaries under 12 years of age.
- Patient co-pay will be $0.
- The administration fee will be based on the assigned route of administration.

Route of Administration	Administration Fees
Injection	$13.00
Subcutaneous	$13.00
Intramuscular	$13.00
Intradermal	$13.00
Nasal	$8.00

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3.7.1 COVID-19 Vaccines

The billing and reimbursement rates for COVID-19 vaccines are based on the published guidance by CMS. If newer rates are published by CMS or a Medicare Administrator Contractor (MAC), the rates may be updated with retroactive payment adjustments as necessary. CMS only priced the administration of these services as the product is being provided for free initially. Refer to DHCF Transmittal #21-15 Updated Professional Services Billing Codes and Reimbursement Rates for COVID-19 Vaccines.

3.7.2 Vaccines for Children Program (VFC)

The Vaccines for Children Program (VFC) is part of the DC Health's Immunization Program. It is a federally funded entitlement program that provides vaccines free of charge to enrolled providers that serve eligible patients. Benefits to becoming a VFC Provider - Provides necessary vaccines to children without incurring vaccine costs. To help improve vaccination rates DHCF in partnership with DOH can approve an enrolled pharmacy provider to bill at zero-dollar ingredient cost, to children at the pharmacy. Approved providers can bill administration fees of $13.00 Providers receive technical assistance to help improve vaccination rates

For additional information, including how to become a VFC provider, please visit https://dchealth.dc.gov/service/vaccines-children-vfc.

3.8 Diabetic Supplies

The District DHCF has contracted with Prime Therapeutics State Government Solutions to manage a DC Medicaid diabetic supplies program. This program applies to DC Medicaid FFS beneficiaries without other insurance or Medicare coverage.

- Refer to the Pharmacy Preferred Diabetic Supply List.
- Lancets are covered under Durable Medical Equipment (DME) benefit. The pharmacy must be a DME provider. Claims should be submitted to DHCF/Gainwell Technologies; if prior approval is needed, please use 719A form: Form 719A.

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4.0 Prior Authorization (PA)

4.1 Standard PA

There are certain drugs that the District Medicaid has designated as requiring a PA in order for the claim to be paid. PAs in this category include the utilization management protocols implemented by the District in other programs. Drugs with limitations will see an NCPDP reject code 75 –Prior Authorization Required or an NCPDP Reject Code 76 – Plan Limits Exceeded. The District Medicaid Pharmacy Call Center phone number will appear on the response message to the pharmacy.

The District Medicaid Clinical Call Center (PBM) will handle all PA requests for the following:

- Benlysta PA Request Form
- Benlysta Patient Education Form
- Cabenuva PA Request Form
- Casgevy PA Request Form
- Epidiolex Clinical Criteria
- Evrysdi PA Request Form
- General Fax PA Request Form
- GLP 1 PA Request Form
- Long Acting Injectable Atypical Antipsychotics PA Request Form
- Morphine Milligram Equivalent (MME) PA Form
- Preferred Drug Program PDL PA Form
- Synagis PA Request Form
- Tezspire PA Request Form
- Travel PA Request Form
- Tzield PA Request Form
- Vivitrol POS Instructions
- Wegovy PA Request Form
- Xeloda PA Request Form
- Zepbound PA Request Form

Refer to link for an up-to-date list of clinical criteria at Home | DC Pharmacy Programs.

4.1.1 Hepatitis C Medications

As of September 2022, DCHF has removed prior authorization (PA) requirements for all Hepatitis C treatment agents designated as preferred, while non-preferred agents will use the general Prior Authorization form. This removal of PA requirements is the same for our Managed Care Plan Medicaid beneficiaries. These and other ongoing PA programs provide access to necessary medications in a manner that is compliant with the medications' Food and Drug Administration (FDA)-approved use

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and/or with national guidelines, evidence- based medicine, or nationally recognized standards of therapy.

The District Medicaid Clinical Call Center is available 24 hours a day, 7 days a week, and 365 days a year:

- **Provider Help Desk**: 1-800-273-4962
- **Clinical Prior Authorization Fax**: 1-866-653-1431
- **Hearing Impaired**: 711

The prescriber must initiate the PA with the District Medicaid Clinical Call Center. If the PA is not initiated prior to the claim submission, the claim will deny with an NCPDP Reject *75 – Prior Authorization required* and have the pharmacy request the prescriber call to obtain a Prior Authorization. **A hyperlink to the PA forms is included in *Section 14.1 – Appendix A: District D.0 Payer Specification* at the end of this manual for reference.**

4.2 Expedited Narcotics PAs

A dispensing pharmacist may verbally request a one-time PA for a narcotic medication when a prescription is generated for a seven-day supply or less from any medical facility.

- The dispensing pharmacist can call the Pharmacy Call Center 1-800-273-4962to request the one-time PA.
- The PBM Clinical Staff can authorize the one-time PA without having to contact the prescribing physician.
- This PA process is **not** intended for
  - Long-term use;
  - Multiple (more than two) narcotic prescriptions; or
  - Prescription quantities greater than a seven-day supply.
- A patient is allowed one expedited prior authorization per drug per 30 days.

4.3 Medication-Assisted Treatment (MAT) Drug Products

Medication-Assisted Treatment (MAT) drug products will be covered up to the FDA- approved maximum daily dose, without prior authorization. MAT drug products, prescribed and dispensed above the FDA-approved maximum daily dose, will require PA. See the chart below: Access to Preferred Drug List District of Columbia Department of Health Care Finance Pharmacy Preferred Drug List. Category Opiate Dependence Treatment Agents, Oral and Injectable.

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MAT Drug Products *brand name products listed for reference noting some products are discontinued** or generic only available*	FDA-Approved Maximum Daily Dose (no PA Needed)	MAT Drug Product Indications	Benefit Type
methadone (Methadose® Dolophine®)	120 mg	OUD	Access through a Dept. of Behavioral Health (DBH) Certified Provider
buprenorphine/naloxone tablets (Zubsolv®)	17.2 mg/4.2 mg	OUD	Pharmacy Benefit
naltrexone	150 mg (alt dosing schedule every 3rd day)	OUD and AUD	Pharmacy Benefit
buprenorphine/naloxone as SL or buccal film (Suboxone®)	24 mg/6 mg	OUD	Pharmacy Benefit (all)
(**Bunavail**®** buccal)	12.6 mg/2.1 mg		
(Cassipa®**)	16 mg/4 mg		
buprenorphine SL tab (Subutex®**)	24 mg	OUD (induction use preferred)	Pharmacy Benefit
buprenorphine implant (Probuphine** ®)	296.8 mg (per 6-month period x 2)	OUD	Medical Benefit — note product d/c by MFR 10/2020
buprenorphine extended release SubQ injection (Sublocade®)	300 mg monthly	OUD	Medical and Pharmacy benefit
buprenorphine injection (Brixadi®)	32 mg weekly, 128 mg monthly	OUD	Medical and Pharmacy benefit
naltrexone kit injection (Vivitrol®)	380 mg monthly	OUD and AUD	Medical and Pharmacy benefit
lofexidine (Lucemyra®)	2.88 mg /24 hours and 14-day duration limit	Not an OUD treatment/ opioid withdrawal symptoms	Pharmacy Benefit
acamprosate calcium (Campral®)	1998 mg	AUD	Pharmacy Benefit
disulfiram (Antabuse®)	500 mg	AUD	Pharmacy Benefit

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Note: This list may not be comprehensive as the drugs approved and discontinued for opioid use disorder (OUD) change frequently. DHCF FFS will generally cover for FDA-approved MAT (OUD And AUD) medications up to the max dose in prescribing information, with no prior authorization (PA) required. **

Policy HCDMA-19-001 transmittal will be located on the DHCF Medicaid Updates website at https://dhcf.dc.gov/page/2019-dhcf-medicaid-updates.

Written Rx for medication-assisted treatment (MAT) will be excluded from co-pay.

4.4 Long-Term Use Controlled Substances PAs

PAs for Schedule II medications intended for long-term use (e.g., diagnosis of Attention- Deficit Disorder [ADD], Attention Deficit Hyperactivity Disorder [ADHD], Narcolepsy, cancer pain, or prescriptions from pain management centers), may require an initial consult with the physician.

PA approval for medications with a qualifying diagnosis can be authorized for a period of up to 12 months.

Medication regimens and/or dosage changes may require an updated PA when deemed clinically necessary.

4.5 Quantity Limits

The following drugs have quantity limits and, if those limits are exceeded, providers will receive an NCPDP reject *76 – Plan Limits Exceeded*:

- Diaphragms are limited to 1 unit per 365 days.
- Inhalation spacers are limited to 4 units per 365 days.
- Glucose monitors/kits are limited to 1 kit per 365 days. Refer to Diabetic Supply section 3.8
- Contraceptive products may be prescribed and dispensed in quantities up to a 12- month supply in a single claim.

Additional drugs with quantity limits are available on the DC Medicaid Pharmacy web portal.

4.5.1 Enoxaparin (Lovenox®) Quantity Limits

If the claim is not submitted in milliliters (MLs), then the claim should be denied with a message posted stating **Bill in MLs**. Quantity limits should match the chart below.

Enoxaparin	ML	Dose/Day	Days/Month	Limit/Month
30 mg	0.3	2	34	20.4
40 mg	0.4	2	34	27.2
60 mg	0.6	2	34	40.8

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Enoxaparin	ML	Dose/Day	Days/Month	Limit/Month
80 mg	0.8	2	34	54.4
100 mg	1.0	2	34	68
120 mg	0.8	2	34	54.4
150 mg	1.0	2	34	68

4.6 Newborn Mother-Baby Claims Process

Effective October 15, 2022, Fee-for-service (FFS) newborn claims will be covered when submitted with mother's cardholder ID and date of birth.

Claims should be submitted with prior authorization type code (PATC) = 8, person code = 03 for dependent. Limited to FFS-covered drugs.

4.7 Morphine Milligram Equivalent (MME)

The MME policy/program is applicable to all **DC Fee-for-Service Medicaid** beneficiaries who are at risk of exceeding the customarily prescribed opioid daily dosages, which can be medically harmful and even fatal. This MME policy/program, however, is not intended for beneficiaries who have an active cancer diagnosis, sickle cell disease, or are in palliative care or hospice. **This policy/program does not limit prescriptions for Medication-Assisted Treatment (MAT) (e.g., Methadone, Buprenorphine, Naltrexone, etc.) that treat substance use disorder (SUD).**

As of October 1, 2019, DHCF will require prior authorization for reimbursement of opioid prescriptions greater than 90 MME and/or a 7-day supply. These changes will limit the Medicaid covered maximum days' supply and the maximum daily dose.

- Policy transmittal will be located on the DHCF Medicaid Updates website at https://dhcf.dc.gov/page/2019-dhcf-medicaid-updates.
- Additional information, including an MME calculator can be found at CDC Guidelines for Prescribing Opioids for Chronic Pain.
- DC Department of Health guidance can be found at https://dchealth.dc.gov/sites/default/files/dc/sites/doh/page_content/attachments/PocketGuideFINAL.pdf
- Also related, see the DC Dept of Health Safe Opioid Prescribing Pocket Guide Pocket Guide, which houses several resources including a Morphine Milligram Equivalent (MME) conversion chart, a checklist for prescribing opioids for chronic pain, and Medication Assisted Therapy (MAT) resources. View the resource "A Collaborative Approach to the Safe Use of Opioids," published by DHCF and DC Drug Utilization Review (DUR) Board.

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5.0 Prescription Drug Monitoring Program

The Prescription Drug Monitoring Program (PDMP) is an electronic database used to monitor prescription trends within a jurisdiction through evaluating reports on the dispensing of controlled substances. The information provided and reported to the PDMP may be helpful in discovering instances of substance abuse, fraud, or diversion. Per Federal law, since October 1, 2021, all **Medicaid Providers** are required to query the PDMP before dispensing a covered substance for **Medicaid patients**. PMP AWARxE is the software vendor for the DC PDMP. For more information and details about the registration process, proceed to https://districtofcolumbia.pmpaware.net/login.

- **Mandatory Query of PDMP**: Per DC Law 23-251, it is mandatory for prescribers and dispensers to query the PDMP prior to dispensing or prescribing an opioid, or benzodiazepine prescription quantity for more than seven consecutive days, every 90 days thereafter during treatment, and prior to dispensing another refill after 90 days.
- In addition, prescriptions for gabapentin, cyclobenzaprine, and all drug products containing Butalbital are mandatory PDMP-reported medications, noted as “drugs of concern.”
- Pharmacists and **other dispensers authorized by law**, are required to report all covered substances dispensed to the PDMP, unless exempt.
- At the time of dispensing, they may access the PDMP database to review the patient history of **covered controlled substances**, and are encouraged to do so; if applicable, dispensers may discuss any concerns with the prescriber and patient.
- (For more information and a complete list of exemptions and related situations, see the full District Of Columbia Municipal Regulations for the Prescription Drug Monitoring Program, DCMR Title 17, Chapter 103.)

5.1 Total Parenteral Nutrition (TPN)

A TPN claim will be defined as a compound that includes an intravenous (IV) drug in HIC3 Therapeutic Class C5B, C9C, or M4B.

HIC3 Description	HIC3
Protein Replacement	C5B
Parenteral Amino Acid Solutions and Combinations	C9C
IV Fat Emulsions	M4B

Claims should be submitted with compound indicator = 2. Submission Clarification Code = 08 allows the pharmacy to accept payment for covered ingredients only. Cost exceeds max will require PA.

5.2 Multi-Ingredients Compound Claim Submission

When multi-ingredients compounds are submitted, each ingredient will be subject to the claims processing rules for the program.

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- If one or more ingredients are not covered, the entire compound will be denied.
- If the provider chooses to accept payment for those ingredients that are covered, they have the option to submit a valid value of 8 in the Submission Clarification Code field (420-DK) upon re-submission of the claim. This code will tell the system to reimburse the provider for those ingredients that are covered as total reimbursement.
- If there are ingredients that require a PA, the provider must call the Help Desk to obtain a PA in order to get the ingredient to pay. When calling for a PA, all criteria for each ingredient requiring PA must be met.
- Compound claims over $1,500.00 will deny and require PA.
- District Medicaid will only accept the submission of multi-line compound claims. Any claim that is submitted with a Compound Code of 2 and only includes one ingredient will be denied with NCPDP Reject 20 M/I Compound Code.

5.3 Death with Dignity

The District of Columbia passed the “Death with Dignity Act of 2016.” The Act establishes a process by which competent, terminally ill residents of District of Columbia can legally obtain a physician’s prescription for drugs to end their life in a humane and peaceful manner. Claims for Death with Dignity procedure should be submitted with ICD-10 code X83.8XXA. Additional information on Death with Dignity procedure is available below:

Department of Health Death with Dignity Contact Information:

- **Phone**: (202) 724-8800
- **Email**: deathwithdignitydc@dc.gov
- **Website**: https://dchealth.dc.gov/page/death-dignity-act-2016.

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6.0 Long-Term Care (LTC) Pharmacy

- LTC pharmacies are identified by Primary Dispenser Type Code 4 (LTC Pharmacy associated with taxonomy code “3336L0003X”).
- Long term beneficiaries’ claims are identified by the following:
  - The Patient Residence Code on the claim = 2 or 3 and the patient is in group 400 or 410; and
  - The Pharmacy Dispenser Type code = 4 (Long-term Care).
- LTC pharmacies can submit claims for all DC Medicaid beneficiaries at the time of dispensing (real time).
- Medications requiring PA should be approved prior to dispensing by the LTC pharmacy.

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7.0 District Specialty Pharmacy Network

7.1 Background

In 2010, the District DHCF worked with the Department of Behavioral Health (DBH) to address access-to-care barriers and to improve medication adherence for FFS Medicaid beneficiaries with behavioral health problems requiring the use of certain injectable antipsychotic medications. These physician-administered anti-psychotic medications were previously available only as a medical benefit through a physician “buy and bill” reimbursement process.

To address these access issues, a Mental Health Specialty Pharmacy Network (MHSPN) was created to allow selected physician-administered injectable antipsychotics and other injectable drugs to be billed as a pharmacy benefit through the pharmacy POS system. DHCF offered pharmacies interested in dispensing these medications directly to physician offices or other healthcare facilities that serve DC Medicaid beneficiaries the opportunity to “opt-in” as a provider for this pharmacy network.

Other injectable medications may be added to the Specialty Pharmacy Network to improve patient adherence.

7.2 Opt-in Enrollment

A DC Medicaid enrolled pharmacy wishing to participate in the MHSPN must complete the network enrollment application and meet the specified delivery and documentation requirements. Refer to the Specialty Pharmacy Network Application.

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8.0 340B Drug Pricing Program

The 340B Drug Pricing Program enables health care organizations or covered entities (CEs) to purchase drugs at significantly reduced prices. The U.S. Department of Health and Human Services Office of Pharmacy Affairs (OPA) is responsible for administering the 340B Drug Pricing Program and is part of the Health Resources and Services Administration (HRSA).

DHCF is implementing its 340B policy effective January 1, 2018. Beginning on this effective date, DHCF recognizes covered entity pharmacies, but not contract pharmacies, as 340B providers. Only covered entity in-house pharmacies that opted to carve-in Medicaid can dispense 340B drugs to beneficiaries and submit claims to the PBM of the FFS Medicaid program. Currently, contract pharmacies are excluded from dispensing and submitting claims for 340B drugs.

New carve-in registrations are accepted by OPA only during the following specified periods:

- October 1 through 15
- January 1 through 15
- April 1 through 15
- July 1 through 15

Covered entities should submit the change request during the open registration period to be able to process DC Medicaid FFS claims on the first day of the next quarter.

Covered entities carve-in enrollment requirements:

- Submit a request for carving-in Medicaid to the 340B Office of Pharmacy Affairs Information System (OPAIS) https://www.hrsa.gov/opa/340b-opais/index.html.
  - Additional information is available at http://www.hrsa.gov/opa.
- Review the information on the HRSA Medicaid Exclusion File located at the OPA website for accuracy.
- The covered entity in-house pharmacy must be enrolled as a DC Medicaid FFS provider.
- Shipping address on the 340B OPAIS must match the pharmacy business address on the DC Medicaid Management Information System (MMIS).
- Please send HRSA approved application, pharmacy contact information, and NPI to DC340B@primetherapeutics.com.
- Claims can be submitted once all documentation is approved by DHCF.
- Service date period will be based on DHCF approval.

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9.0 Medical Benefit Drugs

- **Medical Benefit Drug/Physician Administered Drug (PAD)** are drugs FDA approved to be injected or infused by a health care professional at healthcare facilities (physician's office, outpatient hospitals, clinics, and free-standing infusion centers).
- Providers have two options to acquire injectable Medical Benefit (Part B) drugs.
  - **Buy and Bill option:**
    - This requires providers to purchase and administer the drug prior to submitting claims to bill for the ingredient (drug/biologic/biosimilar) cost and administration fee.
    - Some drugs covered under medical benefit require prior authorization (PA) and the requirements include the following:
      - A cover letter that contains the requestor's contact information, such as phone and fax number;
      - Completed form with prescriber signature and date(s) of requested service; and
      - Physician's current clinical note, which provides information including, but not limited to, patient's profile and history, disease condition, complete examination, diagnosis and staging, and previous treatment regimen and progress.
    - The PA request is submitted via fax to Department of Health Care Finance (DHCF) and the fax number is: (202) 722-5685.
    - Detailed information of a drug covered under the buy and bill policy are available to the fee schedule (available at https://www.dc- medicaid.com/dcwebportal/home).
    - If help is needed about how to submit claims for medical benefit drugs and other services, which are covered under medical benefit, providers should contact Gainwell Technologies Provider Inquiry line at 866-752-9233 or 202-906-8318.
    - For any further information please contact DHCF at 202-442-5952 or 202-442-9076.
  - **White Bagging Option:**
    - This option is applicable to Non-Chemo Injectable Medical Benefit (Part B) drug/biologic/biosimilar.
    - Allows providers to send a prescription/order to the pharmacy and the pharmacy will process the claim and directly deliver the drug/biologic/biosimilar to the physician's office for administration.
    - Only District of Columbia (DC) Medicaid-enrolled pharmacy providers that participate in the FFS Medicaid Specialty Pharmacy Network can process claims for PAD and will be reimbursed for the ingredient cost of the drug/biologic/biosimilar plus a dispensing fee.
    - The administering healthcare provider will only receive an administration fee for the drug, unlike the buy and bill where the provider is reimbursed for the cost of the drug (ingredient cost) plus the administration fee based on the fee schedule.
    - For drugs obtained through the White Bagging model, a prior authorization (PA) request shall be submitted to the Prime Therapeutics Call Center when applicable. The fax number is 866-535-7622 and phone number is 1-800-273-4962.
    - To get the details of the white-bagging option please refer to the **Transmittal #23-08**.

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- If you have any questions or want clarification, please contact one of the DHCF pharmacists:
  - Charlene Fairfax, RPh, (202) 442-9076, Charlene.Fairfax@dc.gov;
  - Gidey Amare, PharmD. (202) 442-5952 Gidey.Amare@dc.gov; or
  - Tayiana Reed, Pharm D, (202) 442-478-1415 Tayiana.Reed1@dc.gov.

9.1 Alliance ICP Program 10/1/2025

The Health Care Alliance program serves residents with no other insurance and those who are not eligible for Medicaid or Medicare and meet eligibility requirements. The program provides healthcare coverage for adults age 21 or older and children age 20 or younger who do not qualify for Medicaid. The HealthCare Alliance offers health care services including inpatient hospital care, outpatient medical care (including preventive care), laboratory services, X-ray, emergency services, prescription drugs, dialysis, durable medical equipment. Podiatry, Vision, Hearing and dental are only covered for children

- Claim processing:

  Health Care Alliance Drugs
  Plan Name/Group Name: Alliance ICP
  BIN: 018407 **PCN**: DCMC018407

A limited number of generic prescription medications are covered. Please refer the Prime Limited Alliance Formulary: DCRx_Limited_Alliance_Formulary.pdf.

- Medical necessity requests for brand medication use published Alliance PA form: District Alliance PA Request Form.
- There are no premiums and no copayments or other charges for medical services covered by Health Care Alliance. There is a zero ($0) dollar copay for prescriptions.
- Dispensing fee of $11.15.
- Physician Administered Drugs (PADs), Injectable medications administered in an outpatient setting including physician offices, outpatient hospitals, clinics, and infusion centers are a covered benefit. Providers that plan to provide service using PADs have two options: Buy and Bill or White Bagging.
- Pharmacy Services are NOT COVERED. This includes no coverage for branded or generic, even if deemed medically necessary, for the following:
  - Anti-obesity medications
  - Smoking cessation therapies
  - Cosmetic medications
  - OTC medications
  - Erectile dysfunction drugs
  - Cell and gene therapy
  - Investigational drugs or off-label use

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10.0 POS Beneficiary Notification and Patient Counseling Mandates

The DHCF is requiring the District Medicaid program's participating pharmacies to distribute individualized written notices to Medicaid beneficiaries whose prescription medication claim request is denied after adjudication at the pharmacy point of sale. The notice explains the rights a beneficiary has when a prescription claim is denied by Medicaid, the responsibilities of the beneficiary, the responsibilities of the pharmacists, and provides a contact number for the District Medicaid PBM Call Center. A beneficiary who continues to believe the claim should be approved by Medicaid may request a Fair Hearing before an Administrative Law Judge.

This applies to all beneficiaries who are served by DC Medicaid, including those enrolled in all DC Medicaid Managed Care Organizations.

Additional information is available at Written Pharmacy Point of Service (POS) Notice.

Most prescription "problems" at the point of sale will generally be minor. They can be handled informally and quickly. As a Medicaid provider, however, **you are required** to direct the beneficiary whose claim has been rejected to the instructions on the beneficiary notification.

10.1 Posters

Retail pharmacies enrolled in the DC Medicaid program must comply with DHCF instructions to prominently post at the point of sale the two (2) 16 x 20 Medicaid beneficiary posters entitled, "THIS IS AN IMPORTANT NOTICE TO DC MEDICAID RECIPIENTS ... " that were provided to your pharmacy. The referenced English and Spanish language posters will provide specific directions to be followed by Medicaid beneficiaries in instances where they believe payment for a prescription is wrongfully denied.

If you have not received the posters, or if you need another copy of either poster, please contact DHCF.

10.2 Beneficiary Notice Forms

District of Columbia Medicaid requires participating pharmacies to distribute individualized written notices to Medicaid beneficiaries whose prescription medication claim request is denied after adjudication at the pharmacy point of sale. This applies to all beneficiaries who are served by DC Medicaid, including those enrolled in all D.C. Medicaid Managed Care Plans.

This individualized written notice will consist of the top (white) copy of the numbered triplicate form entitled, "NOTICE CONCERNING YOUR PRESCRIPTION MEDICATION (NOTICE)."

The notice shall be redistributed by DHCF to each enrolled retail pharmacy providing services to Medicaid beneficiaries in the District of Columbia and the immediate surrounding locations in the Maryland and Virginia suburbs.

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Enrolled pharmacy provider staff will be required to complete the following information on the “NOTICE” prior to giving the top (white) copy of the “NOTICE” to the beneficiary or his/her/their authorized designee at the pharmacy counter:

- Date of Request Denial;
- Beneficiary's name;
- Last four (4) digits of the beneficiary's Medicaid ID number;
- Medication name; and
- Indicating the reason(s) for the denial.

The pharmacy must retain the two bottom copies within the pharmacy in an easily accessible location. The yellow copy of the “NOTICE” shall be returned to DHCF or its designee on a regularly scheduled basis for program compliance monitoring, automatic form replenishment, and data analysis purposes.

Additional notices will be provided whenever pharmacies experience depletion in quantity. Please alert DHCF if additional notices are needed by contacting the DHCF Pharmacy staff. Pharmacies should request additional notices in advance so that notices will always be available for use.

As a reminder, Section 2701.2(d) of Title 29 DCMR requires the pharmacies to cooperate in such initiatives to provide individualized notices, letters, etc. to beneficiaries.

Participation in the Medicaid program requires adherence to and compliance with Medicaid rules and regulations.

Replenishment request form is available on the FFS providers portal: https://www.dc-pbm.com/.

- Click on Provider tab, under frequently requested documents are the following:
  - Triplicate Form Request - Beneficiaries Notice.
  - Beneficiaries Notice – Triplicate Form Request (dc-pbm.com)

Pharmacy Audit Process (on-site and desk audits)

- Implemented by FFS and MCPs effective October 1, 2024.
- Provide continuing education and enhanced support to Medicaid enrolled pharmacies.
- Reinforce pharmacy responsibility to complete and distribute triplicate form copies when a medication is denied for a beneficiary.
- Ensures compliance with Medicaid provider agreement.

10.3 Patient Counseling

The Pharmacist holds the unique position of being the last line of defense, to identify and correct any prescription errors at the point of dispensing. Historically, concerns about improper medication use contributed to the provision in the Omnibus Budget Reconciliation Act of 1990 (OBRA‘90) that

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mandated an offer to counsel Medicaid outpatients about prescription medications. See DC CODE Title 3, Chapter 12; Subchapter

X. Sec 3–1210.06a. “Pharmacist consultation with **medical assistance recipient** or caregivers; records” *emphasis added.*

Subsequently, states enacted legislation that extends the-offer-to counsel requirement to **all** outpatients. Be advised and aware that pharmacists **must** uphold this charge. An offer to counsel with the pharmacist on duty **shall** be made to the customer/patient prior to dispensing a drug or medical device. The offer may be made by the pharmacist *or* his designee by notifying “the patient or the patient's agent of the opportunity to receive an oral consultation from the pharmacist:

- Whenever a prescription drug or device has not previously been dispensed to a patient;
- Whenever a prescription drug or device has not previously been dispensed to a patient in the same dosage form, strength, or with the same written directions;
- Once yearly on maintenance medications; or
- Whenever the pharmacist deems it warranted in the exercise of his or her professional judgment.” DCMR Sec 22-B1919.1

Also, “the pharmacy shall post a sign in a conspicuous manner informing patients of their right to receive an oral consultation from the pharmacist regarding their prescriptions.” DCMR Sec. 22-B1919.2

This offer to counsel is not in effect when a patient refuses and does not apply to institutional settings (outpatient mandate only). Finally, the offer is also required to be made in cases of prescription delivery or when patient is not present by ensuring “that the patient receives written notice:

- Of his or her right to request consultation; and
- A telephone number from which the patient may obtain oral consultation from a pharmacist who has ready access to the patient's record.” DCMR Title 22-B Sec. 1919.5

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11.0 Counseling Signature Log Requirements

Documentation of receipt of prescriptions as well as the offer to receive counseling on the use of the prescriptions is required by the District for each prescription dispensed to an FFS beneficiary. Documentation must include, at a minimum, the prescription number, member name, date filled, date received, and a signature of the person receiving the prescription or offer to receive counseling (i.e., the member, member's representative, or a representative of the facility in which the patient resides).

For medications being delivered, a signature must be obtained. The signature logs are required for the auditor to review, if requested. If the auditor requests further review of a signature log on an audit due to a missing signature log, or if further investigation is needed, only an original signed statement from the member, member's representative, or a representative of the facility in which the patient resides, verifying receipt of the medication and the date it was received, can be provided to the auditor within the time period allotted. The statement must include member contact information.

Signature log and offer to receive counseling documentation must be retained by the pharmacy in a readily retrievable record for a period of at least two (2) years.

11.1 Signature Log Requirements During State of Emergency

- In April 2020, DC Medicaid temporarily waived the beneficiary signature requirement for services provided during the COVID-19 Public Health Emergency (PHE). **See DHCF Transmittal 20-16**.
  - Required capture of Medicaid beneficiary signatures at the pharmacy counter or site of medication delivery will resume at the end of the PHE (May 11, 2023).

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12.0 Audits and recordkeeping

Pursuant to the authority set forth in §1902(a) (30) of the Social Security Act, and 42

C.F.R. § 456.23, and in conjunction with 29 DCMR § 1300, *et seq*. and 1900, *et seq*., the District DHCF conducts post-payment reviews of health care services paid for with Medicaid funds. During such reviews, DHCF verifies that the services were provided to a specific Medicaid-eligible recipient and that the services are both covered and reimbursable under the Medicaid program.

Make note that pharmacy accountability audits **are mandatory**, and shall be accomplished through a review of invoices, prescription file, other records required by federal and District of Columbia laws and regulations. DCMR Title 22-B Section 1503.1

12.1 Recordkeeping Review

It is required that Pharmacies have 5 years of records maintained and accessible within 3 business days of a request. Records include all prescription drugs and devices received, sold, compounded, dispensed, or otherwise disposed of by the pharmacy for a period of five (5) years. In addition, all prescription orders shall be maintained for a period of five (5) years from the date of first dispensing.

It is permissible to comply with this rule by maintaining the most recent two years of records **on site** and the remaining three years of records **off site**, as long as the records can be retrieved within three (3) business days of a request. Prescription records will include all required information by law, and also maintain a record of, or identify by name or initials, the pharmacist performing the final verification of the prescription order. *See* DCMR 22-B1913. “Recordkeeping.”

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13.0 Frequently Asked Questions

1. **How do I enroll or renew my pharmacy enrollment as a DC Medicaid pharmacy provider?**

   DHCF has partnered with Maximus to implement a system for submitting your initial enrollment or re-enrollment application for the DC Medicaid program. The contact information is below:

   Maximus: 1-844-218-9700

   Monday – Friday

   8:00 a.m. – 5:00 p.m. ET

   www.dcpdms.com

2. **Whom should I contact if I have questions about my Remittance Advice (RA) or payments?**

   Please contact Gainwell Technologies Provider Inquiry line at 866-752-9233.

3. **Where do I go for updates on Provider policies, initiatives, and changes at the POS?**

   DHCF launched a quarterly newsletter available on the DHCF web portal that is aimed at our Pharmacy providers to share updates concerning the Medicaid FFS drug Benefit through our PBM Prime Therapeutics. In addition, DHCF holds periodic Pharmacy Provider forums via Zoom with content ranging from updates from our Managed Care Organizations to general pertinent news and information concerning Fee-For-Service Medicaid. An archive of the Pharmacy provider forum presentations is available. https://www.dc-pbm.com/provider/documents/#mh-content

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14.0 Appendices

14.1 Appendix A: District FFS D.0 Payer Specification

The District FFS D.0 Payer Specification document can be found on the DHCF Pharmacy Benefit website at http://www.dc-pbm.com/.

14.2 Appendix B: Prior Authorization Forms

Please refer to the list of current PA forms on the DHCF Pharmacy Benefit website at https://www.dc-pbm.com/.

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15.0 Definitions, Abbreviations, and Acronyms

Acronym or Term	Definition
ADD	Attention Deficit Disorder
ADHD	Attention Deficit/Hyperactivity Disorder
AIDS	Acquired Immune Deficiency Syndrome
BIN	Bank Information Number
COB	Coordination of Benefits
CMS	Centers for Medicare & Medicaid Services
DAW	Dispense as written
DEA	Drug Enforcement Administration
DHCF	Department of Health Care Finance
DMAC	District Maximum Allowable Cost
DOS	Date of Service
FFS	Fee-for-Service
FMAC	Federal Maximum Allowable Cost
FUL	Federal Upper Limit
GSN	Generic Sequence Number
HIC3	Drug therapeutic class
HIV	Human Immunodeficiency Virus
ID	Identification
LTC	Long-Term Care
LTCF	Long-Term Care Facility
MAT	Medication-Assisted Treatment
MCO	Managed Care Organization
MD	Medical Doctor
N-PA	Narcotic Prior Authorization
NADAC	National Average Acquisition Cost
NCPDP	National Council for Prescription Drug Programs
OTC	Over the Counter
PA	Prior Authorization
PCN	Processor Control Number
PDL	Preferred Drug List
ProDUR	Prospective Drug Utilization Review

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Acronym or Term	Definition
POS	Point-of-Sale
RA	Remittance Advice
RPh	Registered Pharmacist
TPL	Third-Party Liability
WAC	Wholesale Acquisition Cost

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