POLICY AND PROCEDURE

DEPARTMENT: Pharmacy Operations	REFERENCE NUMBER: NV.PHAR.01
EFFECTIVE DATE: 7/1/17	POLICY NAME: Pharmacy Lock-In Program
REVIEWED/REVISED: 04/17/18; 01/08/19, 01/13/20, 10/13/20	RETIRED DATE: N/A
PRODUCT TYPE: All	PAGE: 1 of 4

SCOPE:
SilverSummit Health Medical Management and Pharmacy Departments.

PURPOSE:
The purpose of the Pharmacy Lock-In Program is to detect and prevent abuse of the pharmacy benefit, as defined by specific criteria, by restricting members to one specific pharmacy and controlled substance provider (if one is chosen) for a defined period of time.

POLICY:
To monitor and control suspected abuse of the pharmacy benefit by SilverSummit members, as identified and confirmed through analysis and audit by the Pharmacy Department, by restricting the members to only one specific pharmacy and controlled substance provider (if one is chosen) for a defined period of time.

PROCEDURE:
Pharmacy claims will be audited on a monthly basis using selected criteria from the list below to identify potential misuse of the prescription benefit.

- Prescriptions written on a stolen, forged or altered prescription blank issued by a licensed prescriber;
- Prescribed medications do not correlate with the Member's medical condition, as identified by his/her PCP, or ICD-10 code from encounter data;
- Member has filled prescriptions at more than two pharmacies per month or more than five pharmacies per year;
- Member receives more than five therapeutic agents per month;
- Member receives more than three Controlled Substances per month;
- Member receives controlled substances from more than one pharmacy and 3 or more prescribers
- Member receives duplicative therapy from different prescribers;
- Member receives prescriptions from more than two prescribers per month;
- Member has been seen in Hospital Emergency Room more than two times per year;
- Member has diagnosis of narcotic poisoning or drug abuse on file;
- Number of prescriptions for controlled substances exceeds 10 % of total number of prescriptions;
- Referrals from the providers reporting suspected abuse
- Member is taking "Trifecta Medications" (Opioid, Benzodiazepine and Muscle Relaxer)

Once audits have been performed, and members identified and confirmed to have abused the pharmacy benefit, the following process shall occur:

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1. SilverSummit's Pharmacy staff will research cases of potential abuse to validate if inappropriate use of the pharmacy benefit has occurred or is occurring.

2. When a case of inappropriate use is documented, the Pharmacy staff presents the details of the case to the Pharmacy and/or Medical Directors. A decision is then made to determine if member lock-in to a pharmacy and provider is warranted. While in lock-in status, the member will be restricted to one pharmacy to obtain their controlled substance prescriptions; other pharmacies will not be paid if they fill controlled substance prescriptions for the member. If the member is also locked into one provider, only controlled substances prescribed by the designated provider will be reimbursed.

3. If the case is designated inappropriate use, the member will be assigned to a new pharmacy to which the filling of controlled substance prescriptions will be restricted. If necessary, the member will also be restricted to one provider for controlled substances prescribing. Pharmacy Services sends a letter summarizing the decision to the member, with a copy sent to the designated pharmacy, the primary care provider (PCP) and/or other prescribers. If the member wishes to appeal the decision to be placed in lock-in or to designate an alternate pharmacy or prescribing provider, they may submit that request to the Silver Summit Appeals and Grievances Department. The initial request may be made orally, but must be followed within 30 days of the effective date on the lock-in letter by a written request for administrative review. The request must be sent to the following address:

   Address: SilverSummit Health Plan
   Appeals and Grievance Coordinator
   2500 North Buffalo Drive
   Suite 250
   Las Vegas, NV 89128

4. Upon designation of the pharmacy and prescribing provider for lock-in, SilverSummit's Director of Pharmacy coordinates the changes to the contracted Pharmacy Benefits Management Company to initiate the lock-in.

5. The member will be permitted to change pharmacies only if a change of address which places the member at a great distance from the designated pharmacy or if the lock-in

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pharmacy requests that the member be removed from that pharmacy. The member will be permitted to change prescribing providers for controlled substances if deemed medically necessary or if the provider refuses to see the patient.

6. If at any time the pharmacy is out of stock of a member's controlled substance, the member or pharmacy can request an override to use an alternative pharmacy.

7. If the member is out of the area and needs their controlled medication the member or the pharmacy can request an emergency supply override.

8. Case management and education reinforcement of appropriate medication/pharmacy use shall be provided by SilverSummit to "lock-in" members.

9. All "lock-in" members will be reviewed periodically (at least every year from the original lock-in effective date) for program adherence and prescription utilization.
   - Members who still utilize multiple prescribers for duplicative controlled substances during the initial lock-in year will be placed into the lock-in program for another year.

10. Prescriptions, within the limits of the Plan PDL, from all participating prescribers shall be honored and may not be required to be written by the PCP only, unless the member has been restricted to one prescriber for controlled substances.

11. Each member is given the opportunity to dispute the Lock-In determination by submitting an appeal to SilverSummit Appeals and Grievance Department.

12. Provision shall be made for the member to obtain a 72 hour emergency supply of medication at pharmacies other than the designated lock-in pharmacy to assure the provision of necessary medication required in an emergency (e.g. when the designated pharmacy is closed, the member cannot readily access the pharmacy, or the pharmacy does not have the required medication in inventory).

13. If the Member is compliant in the program for a period of four consecutive quarters, the Member, pharmacy, and prescribing provider will be notified by the SilverSummit Pharmacy Department that the lock-in is being removed and the Member is free to access any SilverSummit network pharmacy or provider.

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14. SilverSummit's Compliance Officer will provide program reports to the appropriate State agency of all members participating in the lock-in program in the time frame established by the state. The report will be formatted according to state requirements. This report will include the grand total of individuals admitted and released from the program during the designated quarter.

REFERENCES:
Scope of Work – Pharmacy Services 3.4.6.6

ATTACHMENTS:

DEFINITIONS:

REVISION LOG

REVISION	DATE
Q2 2018 Annual Review – No Revisions	04/17/18
Q1 2019 Annual Review - No Revisions	01/08/19
Q1 2020 Annual Review – No Revisions	01/13/20
Q4 2020 – Updated to add member taking "Trifecta Meds" to reasons for potential Lock In	10/13/20

POLICY AND PROCEDURE APPROVAL

The electronic approval retained in RSA Archer, the Company's P&P management software, is considered equivalent to a signature.