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Memorandum

Date: March 25, 2008
To: Alliance Providers
From: Provider Services & Pharmacy Department
Re: Tamper Resistant Rx Pads

A new federal law, intended to make it more difficult for patients to obtain controlled substances through forged prescriptions is scheduled to go into effect **April 1, 2008**. As of this date in order that the Alliance outpatient drugs will be reimbursable by the federal government, **all written prescriptions** must be executed on tamper-resistant pads.

Despite initial interpretations exempting managed care entities from this provision, the California State Department of Health Care Services notified the Alliance that the Alliance and its providers must comply.

To be considered tamper resistant, a prescription pad must contain at least one of the following three characteristics:

- 1) One or more industry-recognized features designed to prevent unauthorized copying of a completed or blank prescription form;
- 2) One or more industry-recognized features designed to prevent the erasure or modification of information written on the prescription by the prescriber;
- 3) One or more industry-recognized features designed to prevent the use of counterfeit prescription forms.

Pads currently used for Schedule C2-C5 medications meet the CMS requirement.

While you may elect any of the above suggestions to meet compliance, we offer some possible alternatives which include transmitting prescriptions by one of the following methods which are exempt from the payment limitation.

1. Phoned prescriptions
2. Faxed prescriptions
3. E-prescriptions

Prescribers are encouraged to use the California-required tamper resistant prescription pads for controlled drugs which fully meet federal requirements. The directory of approved companies by the Department of Justice and Board of Pharmacy can be found at:

http://www.ag.ca.gov/bne/security_printer_list.php

For in depth details about this new federal law, you can go to the web site:

http://files.medi-cal.ca.gov/pubsdoco/newsroom/newsroom_8840.asp

Please contact Angelique Milhouse, Provider Services Manager at 831-430-5531 or your Provider Services Representative at 831-430-5500.