

WASHINGTON STATE DEPARTMENT OF HEALTH

Pharmacist Toolkit for Dispensing and Billing for OTC Contraceptives in Washington



Washington State
Health Care Authority

DOH 349-071 August 2025

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doh.information@doh.wa.gov

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Contact Information:

Medicaid/Apple Health: applehealthpharmacypolicy@hca.wa.gov

WA State Insurance Plans: [Contact Us | Washington Health Benefit Exchange](#)

Introduction

Pharmacies are an ideal access option for contraception. In Washington, emergency contraception is already offered directly at pharmacies without a prescription along with other over the counter (OTC) contraceptives like condoms, spermicides, and the first ever OTC oral contraceptive. Washington state-regulated health plans cannot require copays or deductibles for FDA-approved birth control. Yet there continues to be several barriers for clients to obtain their choice of OTC contraception at the point of service at pharmacies:

- Clients may not know their rights.
- Pharmacies or pharmacists may not be up to date with state laws.
- Pharmacies or pharmacists may be unsure how to bill insurance for OTC contraception because their workflow depends on prescription orders from providers, not processing consumer-based OTC requests.
- Billing is further complicated by the differing ways the various health plans require OTC claims to be adjudicated.
- If the pharmacist does not have the time or support to process the request, the option for the client to pay up front for the contraception and then submit a reimbursement claim can be a consumer barrier, especially for populations already experiencing disparities in health care.

This toolkit provides information, resources, and workflows to solve for some of these issues. The WA State Department of Health Sexual and Reproductive Health Program (DOH SRHP) collaborated with the Health Care Authority (HCA) and the University of Washington School of Pharmacy to develop this document in hopes of increasing access in communities that face multiple barriers in obtaining their choice of contraceptives.

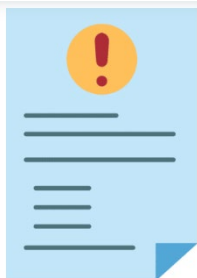
FDA-Approved OTC Contraceptives

- Condoms
- Emergency Contraception – Levonorgestrel 1.5mg
- OTC Daily Contraception Pill – Norgestrel 0.075mg tablet
- Spermicide



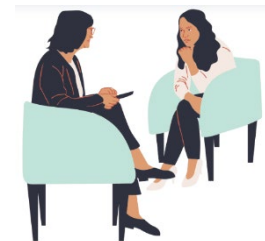
Washington Pharmacy Policies

- ✓ A prescription is **not required** to process a pharmacy claim for FDA-approved OTC contraceptives through a state health plan.



- ✓ All state health plans provide **full reimbursement** for all FDA-approved OTC contraceptives.
- ✓ All state health plans **cannot charge** a copayment or coinsurance for an FDA-approved contraceptive method.

- ✓ Minors **have the right** to get birth control without parental consent.



Template to Bill OTC Contraceptives

Per **RCW 48.43.072**, WA State allows Medicaid and WA Health Benefit Exchange patients to obtain OTC contraceptives and get it adjudicated through insurance without a prescription. To facilitate the process of getting patients their contraceptives, your pharmacy may utilize this template to help process claims. **This template is not a prescription** but may be used similarly to a prescription to help facilitate the processing of a claim and for documentation in case of audit.

Use of this template is not required for the adjudication of a claim

Template for OTC Contraceptive Billing					
Patient Name : _____		Date of Birth : _____		Date : _____	
Product Dispensed: <div style="display: flex; justify-content: space-between;"> <div style="width: 80%;"> <input type="checkbox"/> Condoms (Male/Female) <input type="checkbox"/> Levonorgestrel 1.5 mg tablet (Plan B and generics) <input type="checkbox"/> Norgestrel 0.075 mg tablets (Opill) <input type="checkbox"/> Other: </div> <div style="width: 15%;"> QTY: _____ </div> </div>					
Sig: OTC Item. Use per package instructions to prevent pregnancy.					
Prescriber Field for Medicaid (Apple Health) Plans: (Circle Patient's Medicaid Plan) For current BIN/PCN/GRP Combinations, see Apple Health Plan Billing Information					
Apple Health FFS	Wellpoint <small>(formerly Amerigroup)</small>	Coordinated Care	Community Health Plan WA	Molina Health	United Healthcare
Bill Pharmacist NPI or Pharmacy NPI May need to use: Product ID Qualifier 03 in Field 436-E1					

WA non-Medicaid [Health Benefit Exchange Plans](#):

Most exchange plans will also allow a patient to submit a manual claim if they go to an in-network pharmacy to purchase OTC contraceptives.

WA Health Benefit Exchange Plans Include		
BridgeSpan	Regence BlueShield	Molina Healthcare of WA
United Healthcare	Lifewise of WA	Premiera BlueCross
Coordinated Care	Community Health Plan of WA	Kaiser Health Plan NW/WA
Bill Pharmacist NPI or Pharmacy NPI		

Disclaimer: The information presented in this document may become out of date and is subject to change as plans may change their policies throughout the year. Please contact individual plans for the most up to date information.

HCA Billing for OTC Contraceptives

Frequently asked questions



Over the counter contraception for Apple Health clients

Apple Health (Medicaid) covers over the counter (OTC) contraception, including most emergency contraception, with or without a prescription for clients. An adjudicated pharmacy claim is required for reimbursement.

How do I bill for OTC contraceptives?

To bill the OTC contraceptives, pharmacies must follow the National Council for Prescription Drug Programs (NCPDP) standard and use the national drug code (NDC) or universal product code (UPC) found on the package. A prescription for OTC contraceptives is not required. When there is no prescription, use the pharmacist NPI or, when the health plan's system can accept, the pharmacy NPI.

What OTC contraceptives are covered?

For a list of covered OTC birth control products, see the [Apple Health covered OTC contraceptive list](#).

Does this include emergency contraception (morning after pill)?

Yes, emergency contraceptives are covered.

Are there limitations on OTC contraception?

No, there are no limits on age, gender/gender identity, quantity, or frequency.

Do pharmacies need to screen clients to provide OTC contraceptives?

No, there is no screening process required for provision of contraceptives approved by the FDA for OTC distribution; however, pharmacists are required to provide counseling for emergency contraception.

Do emergency fills apply to OTC contraceptives?

Yes. The dispensing pharmacist may use their professional judgment to meet a patient's urgent medical need, such as a medication that needs to be taken within a specific timeframe, by **issuing an emergency fill to the client**. For fee-for-service, see the [Apple Health Emergency Fill Policy](#): HCA guarantees payment on claims meeting the emergency fill policy even in circumstances where OTC birth control products do not have federal rebate on the Apple Health Covered OTC Contraceptive List. For Managed Care emergency fill information, contact the client's [health plan](#).

Do clients need to have their insurance card to access OTC contraceptives?

No, clients do not need to have their insurance card present to bill insurance. Pharmacies can verify eligibility using the ProviderOne Provider portal or by submitting a claim through their point-of-sale system.

Additional information


For more information to help patients find the birth control that's right for them, visit [the Department of Health birth control and emergency contraception page](#).

Contact

For questions, contact your patient's [health plan](#) or email applehealthpharmacypolicy@hca.wa.gov.

Access the HCA [frequently asked questions for over the counter PDF](#)

Apple Health Contraception One Pager







Need contraception? Apple Health has you covered!


Apple Health (Medicaid) covers over the counter (OTC) birth control without prescriptions or clinic visits at no cost to you!

- 1. Contact your health plan** to locate a covered pharmacy (contact info is on the back of your health plan card).
- 2. Visit the pharmacy counter** (we recommend you bring your ProviderOne and health plan cards).
- 3. Talk to your pharmacist** about what kinds of **birth control or emergency contraception** are right for you or view the resources below for more information.


All FDA-approved options are covered, including:

Condoms	Spermicide
	
Emergency contraception (the "morning after" pill)	Oral Contraception (birth control pills)
	

No age or gender restrictions apply.




Birth Control & Emergency Contraception




doh.wa.gov/birth-control-and-emergency-contraception

Teen Health Hub



doh.wa.gov/teenhealthhub

Over the Counter Contraceptive FAQ



hca.wa.gov/otc-faq

Access the [Apple Health Contraception PDF](#)

Frequently Asked Questions

Do we need a prescription to run a claim for OTC Contraceptive Products?

- **NO**, state law [RCW 48.43.072](#) mandates that [WA Medicaid](#) and any [WA Health Benefit Exchange Plans](#) pay for OTC contraceptive products and (2)(b) do not require prescription to trigger coverage.
- Plans outside WA Health Exchange or WA Medicaid are not subject to the state requirements and may potentially require a prescription for coverage. The patient may need to contact their plan for coverage requirements.

What is the formulary of covered products?

- Not all products are covered. Every plan has a different formulary.
- For WA Medicaid: [Apple Health Preferred Drug List \(PDL\)](#)
 - Some products might not be covered because of the lack of a Federal Rebate Agreement. Check the formulary below and look under the column “Federal Rebate Status”. Items with a federal rebate status of “X” or “Y” should be covered.

Are there quantity limits?

- This differs by plan. Run a claim and see what is paid for.
- WA Medicaid covers emergency contraception with no limits on age, quantity, and frequency.
- WA Medicaid also covers a 12-month fill of the OTC Daily Contraception Pill. [Expedited Authorization Codes](#) may be required depending on Medicaid Plan.
- Health benefit plans issued or renewed on or after January 1, 2026 must provide reimbursement for a 12-month **supply** of contraceptive drugs obtained at one time by the enrollee if requested. [5498.SL.pdf](#).

Which NPI should be used for billing?

- This differs by plan. WA Medicaid plans require the use of the pharmacist or pharmacy NPI. Most Health Benefit Exchange Plans allow the use of pharmacist or pharmacy NPI.
- The former “Dummy NPI” or “Doctor Condom” NPI of 5123456787 has been discontinued. WA Medicaid has transitioned the billing NPI to be consistent with CMS standards. These plans now utilize the pharmacist NPI or the Pharmacy NPI to bill a claim.

Best Practices

Tips for Pharmacies



Educate all staff members on OTC billing for contraception. Success can only be achieved if all staff are on the same page.

Check to ensure your pharmacy system has your pharmacy and its NPI added as a prescriber. Also check to ensure your computer system does not automatically reject claims placed under a pharmacy NPI.



Keep the completed template on file for at least 2 years for record keeping or audit purposes.

Pharmacies should stock a variety of different brands of OTC contraception to ensure coverage due to formulary requirements.



Consider keeping a contraception binder or folder in the pharmacy with the following resources:

- ✓ A copy of this toolkit and template
- ✓ OTC Contraception Patient Education Sheets
- ✓ Contraceptive CDTA and Forms, if authorized to prescribe
- ✓ List of nearby safety net family planning clinics, sexual and reproductive health providers or FQHCs:
 - [Clinic Locations from Washington State Department of Health](#)
 - [HCA Find-a-Provider](#)

Training and Education

- [CDC: Contraception Guidance](#)
- [DOH SRHP - Birth Control and Emergency Contraception Pill Resources](#)
- [Reproductive Health National Training Center](#)
- [Accessible Consumer Choices: Shaping the Future of Contraceptive Care at Pharmacies](#)
- [Roadmap for State Pharmacy Access Laws](#)
- [Over-the-Counter Access to Hormonal Contraception | ACOG](#)
- [WHO launches online learning program to increase access to contraception via pharmacies](#)

Washington State Laws

- [Know Your Rights: Reproductive Health Care \(WA State AG's Office\)](#)
- [Providing Health Care to Minors under Washington Law](#)
- [Reproductive and birth control health rights \(Washington state Office of the Insurance Commissioner\)](#):
 - State health plans must provide coverage for all FDA-approved, over-the-counter contraceptives with no cost sharing, including condoms, spermicides, emergency contraceptives and sponges.
 - State health plans cannot require a prescription for over-the-counter contraceptive drugs, devices, and products approved by the FDA.
- [RCW 48.43.072: Required reproductive health care coverage—Restrictions on copayments, deductibles, and other form of cost sharing. \(wa.gov\)](#)
- Two laws that reflect Washington State's protective approach to reproductive health care and gender affirming care:
 - [HB 1469](#): *Protecting access to reproductive health care services and gender-affirming treatment in Washington state (aka the Shield Law)*
Effective April 27, 2023, the Shield Law provides protections for the receipt or provision of reproductive health care services or gender-affirming treatment in Washington state.
 - [HB 1340](#): *Disciplinary Protections for Providers*
Effective April 27, 2023, HB 1340 establishes that health care provider participation in reproductive health care services or gender affirming treatment does not constitute unprofessional conduct under the Uniform Disciplinary Act (UDA), with some exceptions.
- [SB 5498 - Contraceptive Coverage for 12-Month Supply Effective January 1, 2026](#)

Summary of Resources

Washington State Department of Health

- [Birth Control and Emergency Contraception](#)
- [Clinic Locations](#)
- [Teen Health Hub WA](#)
- [Pharmacy Commission Information](#)

Health Care Authority

- [HCA Find-a-Provider](#)
- [Apple Health Preferred Drug List \(PDL\)](#)
- [over-the-counter-contraceptive-faq-pharmacy.pdf](#)
- [Washington Confidentiality Toolkit for Providers \(HCA 60-0077\)](#)
- [Family Planning Billing Guide](#)
- [Plan_Billing_Info.pdf](#)
- [19-0114 Over the counter \(OTC\) contraception for Apple Health \(Medicaid\) clients](#)

Health Benefit Exchange

- [Plans | Washington Health Benefit Exchange](#)



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