

Summary of Pharmacy Liaison Meeting on March 10th, 2022

Budget Update:

1. Fiscal Year 2023 Budget Presentation and Strategic Plan was posted on the Budget website February 9th, 2022
2. Proposed budget recommendations were included in both the presentation and the press release
3. 2023 Budget should be finalized before the end of September 2022
4. www.michigan.gov/budget

MDHHS Organizational Restructure

Under the umbrella of MDHHS:

1. Streamlining behavioral health services and ensuring both children and adults have better coordinated physical and behavioral health care is a top priority for Michigan's Legislature. As such, organizational restructuring has been occurring and has been finalized within MDHHS. This restructuring better aligns services across community-based, residential and school locations, as well as healthcare settings.
2. January 2022: The Health and Aging Services Administration (HASA) was created under [Executive Order 2021-14](#) combining Aging and Adult Services Agency and our former administration, Medical Services (MSA).
3. HASA will become Behavioral and Physical Health and Aging Services Administration.
4. This acronym change will appear on policies and other published documents beginning 3/21/22.
5. These changes will benefit people of all ages, and all physical and behavioral health needs.

Final Policy Issued:

1. [HASA 22-02](#): Monoclonal Antibody Injections by Pharmacy Providers
 - A. Effective Immediately
 - B. HHS issued the 9th amendment of the PREP Act, which expanded access to COVID-19 Treatments.
 - C. Part of that expansion included pharmacist, techs, and interns' approval to inject COVID-19 mAb treatment or post-exposure prophylaxis (PEP) of COVID-19, or for the pre-exposure prophylaxis (PrEP) of COVID-19 where authorized, and in accordance with their respective EUA provisions.

- D. At this time, no mAb treatments are currently authorized for injection, but that may change.

Published L-letters

1. [L 22-05](#): Clarification of Michigan Automated Prescription System (MAPS) Record Retention Requirements
 - A. [MSA 21-30](#) issued on 7/30/2021 specific to performing a MAPS check & documentation by prescribers or designees of providers.
 - B. MAPS verification for pharmacies was encouraged as a best-practice.
 - C. A discrepancy was identified between the Medicaid Record Retention Policy and the MAPS Record Retention Policy.
 - D. Some prescribers utilize software that integrates their patients' electronic health records with MAPS, i.e., "PMP AWARDX-MAPS". This software stores the MAPS check documentation according to the MAPS record retention policy.
 - E. This L letter, issued on 2/24/2022, clarified that document retention can be stored for either the Medicaid Documentation Requirements currently at 7 years OR the MAPS record retention policy of 5 years and one day, *whichever applies to the provider*.

2. [L 22-04](#): Additional Guidance and Clarification for the Coverage of COVID-19 Prevention, Treatment, and Support Services

This L-letter contains several clarifications of COVID-19 Medicaid coverages, but two specifically relate to Medicaid Pharmacy:

 - A. In accordance with the MTM policy, [MSA 17-09](#), pharmacies may bill **Vaccine Counseling Services under MTM**
 - Effective January 1, 2022, and extending through the last day of the calendar quarter in which the COVID-19 PHE terminates, vaccine counseling may be reimbursed for either the COVID-19 vaccine or any other ACIP recommended vaccine for which the beneficiary is not up-to-date, and when the vaccine is not administered
 - Pharmacy Billing: <https://www.michigan.gov/medicaidproviders> > Billing & Reimbursement > Provider Specific Information > COVID-19 Response > January 2021 PDF, Click "Go"
 - Place of Service = 02—Telehealth, GT interactive modifier must be used, and required in the "Remarks" section is "services provided via telephone"
 - Reminder: MTM services are paid through the Fee-for-Service (FFS) program for beneficiaries enrolled either in FFS or in a Medicaid Health Plan (MHP). There is no cost-sharing responsibility to the beneficiary for the MTM service

B. Medicaid Coverage of COVID-19 Oral Antivirals

- On February 2, 2021, MDHHS issued bulletin [MSA 20-81](#), which declared coverage of FDA EUA drugs, devices and biological products for COVID-19 prevention and treatment
- MDHHS is providing clarification that this policy applies to coverage of EUA oral antiviral drugs for the treatment of COVID-19 when billed in accordance with their respective FDA EUA provisions
- The Department recognizes the additional coordination with prescribers and patient education by pharmacists tied to these treatments. As such, we have classified these agents as specialty products retro effective to their market entry
- FFS and MHP pharmacy claims are coded to pay a dispensing fee of \$20.02 for the COVID-19 oral antiviral treatments to be coded retroactively as well to allow pharmacies to rebill if necessary

Proposed Policy

1. [2156-Pharmacy](#): Signature Log and Proof of Delivery Requirements
 - A. The Signature Log requirements declared waived in [L 20-20](#) have remained in effect since March 26, 2020
 - B. Once MDHHS communicates the termination of that flexibility, this policy will become effective
 - C. Applicable to all prescriptions delivered to the beneficiary's place of residence, pharmacy providers must document receipt or delivery of new or refilled medications to the intended Medicaid beneficiary.
 - D. This documentation must include EITHER
 - The manual or electronic signature of the beneficiary or their representative; OR
 - The tracking detail from the common carrier showing the specific prescription was delivered including both date & time of delivery
2. [2202-Pharmacy](#): Monoclonal Antibody Injections by Pharmacy Providers
 - A. Posted above as Final as well, but concurrent Proposed in order to allow a public comment period
 - B. Any interested party wishing to comment on the change may do so by submitting comments to Vicki Goethals via e-mail at [mailto:GoethalsV@michigan.gov?subject=COVID-19 Response: Coverage of U.S. FDA EUA COVID-19 Monoclonal Antibody Injections by Pharmacy Providers](mailto:GoethalsV@michigan.gov?subject=COVID-19%20Response:%20Coverage%20of%20U.S.%20FDA%20EUA%20COVID-19%20Monoclonal%20Antibody%20Injections%20by%20Pharmacy%20Providers)
3. 21-55 Pharmacy: Update to Contraceptive Supply Limit: 12-month per fill
 - A. Effective 5/1/2022
 - B. Includes:
 - Oral Contraceptives
 - Vaginal Rings

- Contraceptive Hormonal Patch
- C. Purpose:
- Reduction in both gaps in medication continuation and unintended pregnancies
 - Improving pregnancy timing and spacing
 - Improving contraceptive equity and health outcomes while lowering direct costs of pregnancy management
- D. This policy was created by reviewing:
- Other states' policies on extending contraceptive fills. State review found several states that also offer 12-month supplies and no states that offered 6 months
 - 2014 CDC Published Recommendation: *"Prescription of hormonal contraceptives should preferentially cover one year's supply to decrease barriers to care"*

Web Announcements

1. As a result of quarterly MCO Common Formulary Workgroup activities, the newest quarterly web posting 'Summary of PDL changes' has been posted to better inform prescribers and pharmacies
 - A. <https://michigan.magellanrx.com>
 - B. **Latest update** is effective 2/1/2022
 - C. The next update will be posted 5/1/2022
2. COVID-19 Home Tests – Pharmacy Billing and Reimbursement
 - A. Subject to change, a list of Medicaid Covered COVID-19 home tests is available: www.michigan.magellanrx.com > Providers > Documents > COVID-19 Test Products Covered NDC List
 - B. Coverage details per [MSA 21-50](#)

Discussion/Pharmacy Liaison Feedback

1. Pharmacy Monoclonal Antibody Policy Language
 - A. It was identified that the policy language utilizes the term "subcutaneous" which is not always in accordance with COVID-19 mAb EUA administration
 - B. **Response:** MDHHS Pharmacy Policy is revising the language in this policy to remove the term "subcutaneous" from the language
 - C. As this is a minor change, the policy will be reissued as final very soon
2. Pharmacy confusion regarding billing for Continuous Glucose Monitoring devices (i.e., Omnipod & Dexcom CGMs) was shared
 - A. Certain Walgreen's, CVS and Meijer are the majority of billers that are calling the Program Review Division asking if they need PA and how to bill the CGMs.

- B. There might be a chance that Corporate isn't communicating to all their stores that stores have to work with their software vendors to allow them to submit the claims to Medicaid/CHAMPS as the DME/Medical Supply benefit that we cover it under.
- C. **Response:** MDHHS & MPA have worked together to issue a communication to pharmacies that includes specific instructions on how to bill

MDHHS 2022 Pharmacy Liaison Meeting Dates

1. Meetings are on Thursdays, and will be held virtually via Microsoft Teams from 2:30pm-4:30pm
 - June 9th
 - September 8th
 - December 8th
2. Please contact [mailto:goethalsv@michigan.gov?subject=Pharmacy Liaison Meeting](mailto:goethalsv@michigan.gov?subject=Pharmacy%20Liaison%20Meeting) [Contact List](#) if you need any participants added to meeting invitations that include links for participation
3. Schedule: www.michigan.magellanrx.com > Provider > Pharmacy Liaison Committee > Schedule

Resources:

1. MDHHS Policy Bulletins: www.michigan.gov/medicaidproviders > Policy, Letters & Forms
2. Web Announcements: <https://michigan.magellanrx.com>
3. Magellan Technical Call Center Phone: 877-624-5204
4. MDHHS Pharmacy Services Contact: MDHHSPharmacyServices@Michigan.gov

Coronavirus Resources

- A. [CDC.gov/Coronavirus](https://www.cdc.gov/Coronavirus) or [Michigan.gov/Coronavirus](https://www.michigan.gov/Coronavirus)
- B. All communications materials on the COVID-19 vaccine for providers to share with the public: www.Michigan.gov/covidvaccine
- C. For local vaccine sites, visit the CDC: www.vaccinefinder.org
- D. Any additional MDHHS pharmacy coverage or policy updates will be communicated via web announcements posted at:
 - <https://michigan.magellanrx.com/provider/>
 - [Michigan.gov/MCOPharmacy](https://www.michigan.gov/MCOPharmacy)
- E. FDA listing of currently approved and EUA-authorized tests: <https://www.fda.gov/medicaldevices/emergency-situations-medical-devices/emergency-use-authorizations#coronavirus>
- F. Monoclonal Antibody Locator: www.michigan.gov/coronavirus > Resources > COVID-19 Therapeutics Information Page > Find an Antibody Treatment Site
 - Sotrovimab is currently available