

## MFC-MD May 2024 Annual Policy Review and Update Summary 200 Series- Pharmacy and Therapeutics Committee

### Changes that apply to all policies:

- Moved P&T Committee listing from “Responsible Department” to “Responsible Parties” section.
- Reformatted font and procedure to improve readability.
- Updated all NCQA, MCO Standards, and COMAR to current year references.
- Updated policy Approver titles and removed individual names.

Policy Number and Name	Description of Revision/Review
200: Additions and Deletions to the Formulary	Retired; contents of this policy incorporated into Policy 209
201: Brand Name Prescription Authorization	Retired; contents of this policy incorporated into Policy 205
202: Pharmacy & Therapeutics Committee	<ul style="list-style-type: none"> <li>• Clarified Purpose statement.</li> <li>• Removed “Review and Approve Drug Safety programs” (6)</li> <li>• Replaced MFC abbreviations for standardized referencing.</li> <li>• Added references to annual update of formulary Preface.</li> <li>• Added time frames for pre- and post- P&amp;T Communications.</li> <li>• Added Section 1.5 all references to Copays and Tier assignments due to new copay regulations eff. 5/1/2024.</li> <li>• Added Policy 711 reference for Conflicts of Interest.</li> <li>• Expanded listing of PBM related tasks for completeness.</li> <li>• Added references to maintaining Specialty medication info.</li> <li>• Added Formulary change letter tasks and procedures to responsibilities of P&amp;T Chairperson.</li> <li>• Added information regarding review and approval of PA/ST criteria.</li> <li>• Transferred procedures for communicating negative formulary changes to members to Pharmacy Policy 209, Section 5.3</li> <li>• Transferred policy describing timing of formulary changes to Pharmacy Policy 209: Section 6.</li> </ul>

<p>203: Drug Use Evaluation (DUE)</p>	<ul style="list-style-type: none"> <li>• Added reference to Code of Federal Regulations</li> <li>• Added Policy section to capture MDH MCO Standard 4.1.</li> <li>• Removed incorrect NCQA reference.</li> <li>• Added Policy Statement to capture MDH MCO Standard 4.1.</li> <li>• Added Section 2.1, DUE tools and procedures.</li> <li>• Changed references of CVS-Caremark to MFC-MD pharmacy</li> </ul>
	<p>benefit manager (PBM).</p> <ul style="list-style-type: none"> <li>• Added statement of P&amp;T to maintain patient confidentiality.</li> <li>• Removed previous Sections 7 and 8 that described point-of- dispensing pharmacist DUE activities that are beyond scope of MFC-MD.</li> <li>• Added Section 6 to describe how MFC-MD uses PBM supplied POS DUR data, cadence, and procedures.</li> </ul>
<p>204: Early Refill, Managed Drug Limitations, Lost Medication &amp; Travel Supply Policy</p>	<ul style="list-style-type: none"> <li>• Added definition of Medical Reviewer.</li> <li>• Included patient ability to initiate requests/overrides.</li> <li>• Transferred section 10, describing medications eligible for 90- day supplies to Pharmacy Policy 209, Section 2.</li> <li>• Clarified that clinical documentation to support review will be requested by the preauthorization staff unless the request is for a vacation supply or to replace lost meds.</li> <li>• Restricted scope of preauthorization staff to approve early refills for dose increases only.</li> <li>• Modified reference to CVS to PBM.</li> <li>• Added that MedStar may request a copy of a police report when requested to replace stolen medications. (4.2.)</li> <li>• Clarified that travel within the USA must adhere to utilization thresholds.</li> <li>• Added exceptions for Corrective Managed Care patients.</li> </ul>

<p>205: Non-Formulary Policy</p>	<ul style="list-style-type: none"> <li>• Refined the Purpose Statement.</li> <li>• Expanded the Policy Statement.</li> <li>• Added definition of Medical Reviewer.</li> <li>• Clarified the process for identifying and redirecting to formulary preferred alternative medications.</li> <li>• Clarified that all clinically appropriate formulary alternatives should be exhausted before approving a non-formulary request.</li> <li>• Restricted action of redirection to occur only under the supervision of a Medical Reviewer.</li> <li>• Incorporated all of Policy 201; clarified and expanded procedures for brand-name medication requests.</li> <li>• Aligned requirement for a completed MedWatch form with COMAR standards.</li> <li>• Included MedWatch form and directions for reference.</li> </ul>
<p>206: FDA Drug Recalls and Market Withdrawals</p>	<ul style="list-style-type: none"> <li>• Added "market withdraws" to Purpose Statement.</li> <li>• Clarified wording in Section 3 to include all types of recalls to align with 2024 NCQA Standards.</li> <li>• Added section 4.3 to address unclassified drug recalls.</li> <li>• Corrected Section 5 to identify the PBM as responsible party for recall mailings.</li> </ul>
<p>208: P&amp;T Policy &amp; Procedure Review</p>	<ul style="list-style-type: none"> <li>• Removed Policy Background statement.</li> <li>• Added: Physicians and Pharmacists develop policies.</li> <li>• Added: Procedures for policies, feedback, and voting.</li> <li>• Added: Timelines and procedures for Policy changes.</li> <li>• Added: Timelines and procedures for interim Policy updates.</li> </ul>

209: Formulary Management	<ul style="list-style-type: none"> <li>• Changed title from “Review, Selection &amp; Evaluation of Meds Included in the Closed Formulary” to “Formulary Benefit Management” to reflect all current content.</li> <li>• Aligned the Purpose Statement and Policy Statement with the updated content.</li> <li>• Incorporated the content of retired policies: <ul style="list-style-type: none"> <li>200: Additions and Deletions to the Formulary (1)</li> <li>204: Sections re: 90-day supplies (2.2, 2.3)</li> <li>210: Step Therapy (2.5)</li> <li>212: Prior Authorization (2.6)</li> <li>214: P&amp;T Website Update (3)</li> <li>215: PA Table Review (1.10.1; 2.6; 3.1; 3.2)</li> <li>222: Specialty Pharmacy (2.9)</li> </ul> </li> <li>• Added description of benefit excluded medications (1.3) and medications carved out to FFS (1.4).</li> <li>• Established that brand product coverage converts to generic once available (1.5.1).</li> <li>• Added statement that all formulary requests will be brought to P&amp;T within 2 meeting cycles (1.9.3).</li> <li>• Included description of MDL/QL as part of UM (3.4)</li> <li>• Added that provider notification may occur via electronic mail (4.4)</li> <li>• Consolidated redundant content.</li> </ul>
210: Step Therapy	Retired; contents incorporated into Policy 209
212: Pharmacy Prior Authorization	Retired; contents incorporated into Policy 218
213: Pharmacy Downtime Procedures	<ul style="list-style-type: none"> <li>• Changed title from “Pharmacy Plan/Pharmacy Crisis Plan” to “Pharmacy Downtime Procedures”.</li> <li>• Updated Purpose to include Statewide Emergency systems.</li> <li>• Updated Policy scope.</li> <li>• Updated Procedure scope.</li> <li>• Changed all references to state “MFC-MD” for consistency.</li> <li>• Added escalation pathway for PBM support.</li> <li>• Reorganized the processes for prior authorization during downtime.</li> <li>• Added Appendix 1: PA/NF Medication Request form.</li> </ul>
214: P&T Website Update	Retired; contents incorporated into Policy 209
215: Prior Authorization Table Review	Retired; contents incorporated into Policy 209

<p>217: Corrective Managed Care</p>	<ul style="list-style-type: none"> <li>• Expanded Scope to include all misuse of plan pharmacy benefit, align with COMAR updates.</li> <li>• Added references throughout policy to define the misuse of inappropriate filling of medications or use of providers.</li> <li>• Added Appendix I, letter template.</li> </ul>
<p>218; Pharmacy Authorization Process</p>	<ul style="list-style-type: none"> <li>• Incorporated Policy 212: Pharmacy Prior Authorization</li> <li>• Reworded the Purpose statement for clarity and to remove references to policies that cite this policy as a reference.</li> <li>• Added additional phone number for initiating an authorization request.</li> <li>• Clarified the process for redirecting to formulary preferred alternative medications, with emphasis that this may be done only by a Medical Reviewer or under the direct supervision of a Medical Reviewer.</li> <li>• Removed obsolete references to the 2017 Hepatitis-C PA timeline and all references.</li> <li>• Added Appendix I: Prescription Reimbursement Claim Form</li> </ul>
<p>219; Opioid Prescription Parameters and Limitations</p>	<ul style="list-style-type: none"> <li>• Changed Policy name from “Opioid Prescription Parameters and Limitations to “Opioid Prescription Prior Authorizations.”</li> <li>• Moved P&amp;T Committee listing from “Responsible Department” to “Responsible Parties” section.</li> <li>• Reformatted font and procedure to improve readability and align with MedStar standards.</li> <li>• Removed incorrect NCQA references.</li> <li>• Updated MCO Standards</li> <li>• Removed incorrect COMAR references.</li> <li>• Added MD Medicaid Advisory Reference</li> <li>• Added definition of Opioid Naïve, Medical Reviewer</li> <li>• Added reference to Federal Support Act</li> <li>• Updated policy Approver title; removed references to individuals.</li> <li>• Added web address to Opioid Prior Authorization form.</li> <li>• Added that negative urine screens may be grounds for a denied request.</li> <li>• Added statement that an executed pain contract must be dated within one year to be valid.</li> <li>• Added verbiage that all opioid PA requests are reviewed by a Medical Reviewer.</li> <li>• Added clarifying statement that the exception for sickle cell disease does not apply if the patient has received gene therapy.</li> </ul>

	<ul style="list-style-type: none"> <li>• Added Section 4 to align with MCO Standard 2.14 at recommendation of MDH.</li> <li>• Added requirement that a referral to Care Management will be made to assist member with finding a network provider if needed.</li> <li>• Added that MedStar Family Choice may request documentation (police report) when patient reports stolen medications.</li> <li>• Added state requirement and reference stating that patients paying cash for controlled substances shall be referred for FWA (8).</li> <li>• Added Appendices I and II to show prior authorization form, removed embedded files.</li> </ul>
220; Prevention of Fraud, Waste, and Abuse in Pharmaceutical Utilization	<ul style="list-style-type: none"> <li>• Renamed Policy from “Prevention of Fraud, Waste, and Abuse in Pharmaceutical Utilization” to Management of Pharmacy Benefit FWA”</li> <li>• Removed references to NCQA and COMAR 10.67.09.04 which are not applicable to this policy.</li> <li>• Updated references to MDH Departments and workflow for reporting suspected fraud.</li> <li>• Added reference and content to align with MD Medicaid Pharmacy Program Advisory No. 94 regarding members paying cash for controlled substances.</li> <li>• Added Section 4 to describe procedures related to pharmaceutical FWA of non-controlled substances.</li> <li>• Transitioned figure 1 flow-chart into descriptive text outlined in Section 5.</li> </ul>
221; Continuous Glucose Monitors	Retired; contents obsolete
222: Specialty Pharmacy	Retired; contents incorporated into Policy 209