

**Managed Care Operations Memorandum**  
**General Operations**  
**MCOPS Memo # 03/2018-003**

**Date:** March 15, 2018

**Subject:** Prior Authorization of Opioids and Medication Assisted Treatment (MAT)

**To:** Physical Health and Community HealthChoices Managed Care Organizations - Statewide

**From:** Laurie Rock, Director, Bureau of Managed Care Operations, Office of Medical Assistance Programs

Kevin Hancock, Acting Deputy Secretary, Office of Long Term Living

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**Purpose:**

The purpose of this Operations Memorandum is to inform all HealthChoices Physical Health Managed Care Organizations (PH-MCOs) and Community HealthChoices MCOs (CHC-MCOs) that the provisions outlined in the February 28, 2018 letter to all insurers in Pennsylvania from Rachel L. Levine, M.D., Acting Secretary of Health and Physician General, Teresa D. Miller, Acting Secretary, Department of Human Services, Jennifer S. Smith, Acting Secretary, Department of Drug and Alcohol Programs, and Jessica K. Altman, Acting Commissioner, Pennsylvania Insurance Department (see attached) related to long and short-acting opioids and MAT apply to all MCOs.

**Background:**

The Department recognizes the steps the MCOs have taken to ensure that their prior authorization policies and guidelines to determine medical necessity of long-acting and short-acting opioids for children and adults are consistent with current Centers for Disease Control and Prevention (CDC) Guidelines for Prescribing Opioids for Chronic Pain and the additional requirements listed in MCOPS Memo # 09/2017-2018, issued August 13, 2017. The new requirements related to long and short-acting opioids and MAT are part of the ongoing commitment of the Administration to address the opioid crisis. The requirements will ensure consistency between the managed care and fee-for-service delivery systems and among the MCOs, while providing beneficiaries with access to quality care, preventing opioid dependency, and comprehensively treating opioid dependency if it does occur.

## **Discussion:**

Requirements that apply to MAT:

- At least one buprenorphine/naloxone combination product(s) must be covered without a requirement for prior authorization
- Prior authorization may be required for the following: Buprenorphine without naloxone
  - Buprenorphine for patients also taking benzodiazepines or other CNS depressants Prescribed quantities that exceed daily dose limits
  - Non-preferred or non-formulary drugs
- Both injectable and oral naltrexone must be covered without a requirement for prior authorization
- At least one form of nasal naloxone must be covered without a requirement for prior authorization and without quantity limits

As set forth in the Attachment to the February 28, 2018 letter, the MAT changes must be implemented within 60 days from the date of the letter.

Requirements that apply to opioids:

The Attachment to the February 28, 2018 letter sets forth the timeline for the implementation of the thresholds for prior authorization of opioids. Prior authorization requirements and guidelines that were implemented in response to MCOPS Memo # 09/2017, even if consistent with the requirements for Phase 1, 2, or 3, must remain in place. Any changes required for compliance with Phases 1, 2, or 3 must be implemented by the dates listed in the Attachment to the letter.

## **Next Steps:**

1. All MCOs must review their current prior authorization policies for long and short acting opioids and MAT to determine what revisions must be made to their requirements for prior authorization and guidelines to determine medical necessity to reflect the changes in the Attachment to the letter.
2. MCOs must submit their revised policies for MAT Prior Authorization Review Program (PARP) review by April 2, 2018 for review and approval prior to implementation within the specified timeframe.
3. MCOs must submit their revised policies for opioids PARP review by August 1, 2018 for review and approval prior to the Phase 1 September 1, 2018 implementation.

**Obsolete:**

N/A

**Attachment:**

Letter from Rachel L. Levine, M.D., Acting Secretary of Health and Physician General, Teresa D. Miller, Acting Secretary, Department of Human Services, Jennifer S. Smith, Acting Secretary, Department of Drug and Alcohol Programs, and Jessica K. Altman, Acting Commissioner, Pennsylvania Insurance Department dated February 28, 2018.



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