

## NEW MEDICAID OPIOID PRESCRIBING INITIATIVE

On February 28, 2018, the Missouri Departments of Social Services, Health and Senior Services, and Mental Health jointly announced a new initiative to regulate opioid prescribing practices in the Medicaid program. Implementation will begin March 1, 2018.

Using a set of 14 metrics, MO HealthNet will identify prescribers whose opioid prescribing practices for one or more patients fall outside MO HealthNet's expectations. State officials say these metrics are based on a proprietary system operated by CMT/Relias, which considers the federal Centers for Disease Control and Prevention's opioid prescribing guidelines as well as other evidence-based practices.

Prescribers will first receive an individualized "[Opioid Prescription Intervention](#)" report and an [accompanying letter](#). They will be mailed to prescribers based on their Medicaid opioid prescribing from the previous quarter. State officials project that these mailings could encompass as many as 8,000 prescribers but that the number of recipients could range from 2,500 to 8,000 by varying the selection criteria. The mailing will include a "feedback form" to "facilitate provider communication in response to issues identified in the individualized OPI mailing." State officials also reiterate that this type of practice advisory letter has been sent to prescribers for some years. However, there appears to have been minimal state follow-up or enforcement activity.

### **The new initiative imposes provider expectations and sanctions for noncompliance.**

Beginning March 1, providers who receive this initial mailing will be expected to modify their prescribing practices to comply with the MO HealthNet standards or submit the clinical data justifying the prescription history. Responses are to be directed by mail, email or fax to the Missouri Medicaid Audit and Compliance Unit. Providers who do not respond will be sent a [second letter](#) requesting a response within 20 business days. Further failure to respond will incite referral to the state Bureau of Narcotics and Dangerous Drugs, the State Board of Registration for the Healing Arts or other appropriate licensure board and/or the practitioner's employer.

The initiative also is to include an opportunity for prescribers to request peer-to-peer consultation regarding the clinical issues raised by these mailings. State medical officials indicate they are working to expand the state's capacity on this front.

At the event announcing the new initiative, state officials could not confirm whether or how the practice standards established for prescribing in the Medicaid program are synchronized with those used in Missouri state government's prescription drug monitoring program that uses a proprietary Express Scripts methodology to identify suspect prescribing patterns.

Also, state officials announced that beginning March 6, MO HealthNet will begin to introduce edits to the Medicaid pharmacy payment system to deny claims for prescriptions that fail to comply with the agency's prescribing standards. State officials indicate that a means of tracking a patient's accumulated morphine-milligram-equivalent dosing will be in place by May 1, 2018, and will be the basis for prior authorization requirements.

