



DST Pharmacy Solutions, Inc. (Pharmacy Solutions) Response to Advance Notice of Methodological Changes for Calendar Year (CY) 2019 for Medicare Advantage (MA) Capitation Rates, Part C and Part D Payment Policies and 2019 Draft Call Letter

March 2, 2018

Pharmacy Solutions respectfully submits the following comments related to the 2019 Draft Call Letter section on *Improving Drug Utilization Review Controls in Medicare Part D*.

CMS Proposal	Pharmacy Solutions Response
Part D Opioid Overutilization Policy	
Implementing a days supply limit for initial fills of prescription opioids (e.g., 7 days) for the treatment of acute pain with or without a daily dose maximum (e.g., 50 MME per day). (Page 204, Call Letter)	Pharmacy Solutions actively engaged in the NCPDP-sponsored industry review of the opioid sections of the Call Letter. We support the NCPDP recommendations and suggest that CMS respond to the comments and recommendations presented by NCPDP.
Concurrent DUR <i>Cumulative Morphine Milligram Equivalent Daily Dose (MME) Safety Edits for High, Chronic Prescription Opioid Users</i>	
Propose sponsors should implement these edits in 2019 to allow beneficiaries to receive a 7 days supply of the prescription that triggered the hard edit as written. The patient could elect not to receive the partial 7 days supply fill (e.g., they are not out of the medication) and go through the exceptions process. In that case, if approved, the original prescription could be filled. Also, in the case of opioid prescriptions that trigger the 90 MME hard edit where the packaging is only available in a days supply greater than 7 days, we would not expect any supply to be provided. The beneficiary would need to obtain an approved exception in order to get the medication. Nonetheless, CMS is not aware of any State laws or labeling that would prohibit prescription opioids from being dispensed in a smaller quantity. (Page 210, Call Letter)	Pharmacy Solutions actively engaged in the NCPDP-sponsored industry review of the opioid sections of the Call Letter. We support the NCPDP recommendations and suggest that CMS respond to the comments and recommendations presented by NCPDP.
Additionally propose to only allow the 7 days supply once. (Page 210, Call Letter)	Pharmacy Solutions actively engaged in the NCPDP-sponsored industry review of the opioid sections of the Call Letter. We support the NCPDP recommendations and suggest that CMS respond to the comments and recommendations presented by NCPDP.
Concurrent DUR <i>Days Supply Limits for Opioid Naïve Patients</i>	
CDC Guideline states that opioids prescribed for acute pain should be limited to three days or fewer, and that seven days are rarely necessary. Currently, at least sixteen States have or plan to add by statute or agency rule days supply (e.g., 5 or 7 days) and/or daily dose limits on the initial amount of opioids that clinicians can prescribe for 'acute' pain. (Page 212, Call Letter)	Pharmacy Solutions actively engaged in the NCPDP-sponsored industry review of the opioid sections of the Call Letter. We support the NCPDP recommendations and suggest that CMS respond to the comments and recommendations presented by NCPDP.