

## Stakeholder Comments to Draft Single Formulary and Electronic Prior Authorization report

(Stakeholders were provided a draft report for review and comment prior to  
submission of the report to the Vermont Legislature)

Name of Commenter	Date Received	Content of Suggested Change
Diane Neal, RPh Clinical Account Manager MedMetrics Health Partners	2/8/12	The paragraph I highlighted on page 22 seems to have some issues.
Madeleine Mongon Deputy Executive Vice President Vermont Medical Society	2/10/12	<p>Thank you for circulating the draft <i>Single Formulary and Electronic Prior Authorization Recommendations</i>. Here are a few more comments from VMS.</p> <p>Page 5 -- Prior authorization – In this section, we would recommend that the report acknowledge that the cost savings for payers attributed to prior authorization are achieved, at least in part, by shifting increased administrative burden and added cost to prescribers and dispensers. Prescribers recommend that the time they spend on prior authorization should be reimbursed by payers.</p> <p>Page 7 – PBM Market Share – VMS recommends including the market share for the major PBMs in Vermont. For example, we believe that two of the major insured plans, BCBS of Vermont and Cigna and the State Employees Health plan all use the same PBM, Express Scripts, which could be helpful in designing a phased-in approach to a single formulary.</p> <p>Page 10 Develop plan for multi-payer single web portal VMS recommends adding:</p> <ul style="list-style-type: none"> <li>• Enable providers to access payer portals with a single set of secure credentials</li> <li>• Use single web portal to perform identity management, authentication, digital identification</li> <li>• Pre-populate the information needed by payers for prior authorization as much as possible</li> </ul> <p>Identify and evaluate best practices among insurers and other states that promote administrative simplification and quality improvement processes for formulary support services. VMS recommends adding to the list:</p>

		<ul style="list-style-type: none"> <li>• Develop and recommend a common prior authorization form, similar to the Part D exception form</li> <li>• Ensure that payers' websites include the evidence-based guidelines and key criteria that will be used to make a final determination on prior authorization request</li> </ul> <p>Page 18 Prior Authorization  In the first bullet, we would suggest amending the description of the single form as follows:  Some states have pursued the use of a uniform prior authorization form to be accepted by all payers, <u>with varying success—and are at varying stages of design and implementation.</u></p> <p>Thank you for considering these comments. Please let me know if you have any questions.</p>
Robin Lunge Director of Health Care Reform Agency of Administration	2/13/12	<p>One small clarification - the specialty tier language from last year was just a 1 year moratorium. We are proposing to eliminate them in this year's bill, but that has not passed. You should correct that on page 4. Cliff Peterson at BISHCA can give you the skinny in detail.</p> <p>Did Lindsey give you any feedback about possible exchange opportunities for administrative simplification or alignment via the benefit requirements under the ACA? If not, it might be good to just mention in the interim strategies that we are exploring whether it is possible to achieve some of the administrative simplification in the exchange.</p>
Ronald.DeBellis Pharm. D., FCCP, Albany College of Pharmacy and Health Sciences-Vermont	2/10/12	Jennifer, please convey my congratulations to the rest of your team. This is very well written and a step in the right direction!
Harold Schwartz State of Vermont Department of Human Resources	2/9/12	<p>I am responding on behalf of Commissioner Duffy, Department of Human Resources.</p> <p>We recommend the following change, on page 11, section 2: Intermediate-Term Goal.</p> <p>Change "State employees, if able to negotiate" to "State employees, subject to labor agreements and/or statute"</p>