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Vermont Medicaid Pharmacy Newsletter

04/08/2016

Federal Upper Limit (FUL) Update:

The Department of Vermont Health Access (DVHA) would like to inform all Pharmacy Providers of an upcoming change regarding pharmacy claim pricing, effective on 5/1/2016.

As you may know, part of the Affordable Care Act was to revise the Federal Upper Limit (FUL) provisions requiring that the Secretary calculate the FULs in accordance with CMS-2345-FC. The federal upper limits have not been adjusted since 9/25/2009. With the recent finalization of the Covered Outpatient Drug Rule (CMS-2345-FC), CMS will resume publication of the new and updated FUL's. The final Affordable Care Act FULs are effective on April 1, 2016 to coincide with the effective date of CMS-2345-FC. In order to come into compliance, states have up to 30 days from the April 1, 2016 effective date to implement the FULs. Thereafter, the FULs will be updated monthly on the Medicaid.gov website, and will be effective on the first date of the month following the publication of the update. Therefore, beginning 5/1/2016, Goold Health Systems (GHS) will implement the first of the monthly updated FULs and incorporate these into the "lower of logic" when calculating the reimbursement, consistent with the pharmacy pricing reimbursement policy. Current Point of Sale (POS) system overrides of the previously outdated FULs (prior to 4/1/2016) that GHS has in place will be terminated allowing the "new" CMS FULs to be used in the calculation.

Below is the link to the draft January 2016 and February 2016 Affordable Care Act FULs and the Methodology and Data Elements Guide used to calculate the Affordable Care Act FULs. **To view the finalized FUL monthly files, please visit the [Pharmacy Drug Pricing](http://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Benefits/Prescription-Drugs/Pharmacy-Pricing.html) page at <https://www.medicaid.gov/Medicaid-CHIP-Program-Information/By-Topics/Benefits/Prescription-Drugs/Pharmacy-Pricing.html>**

If you have any questions please contact GHS at 844-679-5362