STATE OF MICHIGAN

DEPARTMENT OF INSURANCE AND FINANCIAL SERVICES

Before the Director of the Department of Insurance and Financial Services

In the matter of:

[redacted]
Petitioner

v **File No. 243688-001**

Health Alliance Plan of Michigan
Respondent

Issued and entered
on February 25, 2026
by Joseph Stoddard
Special Deputy Director

ORDER

I. PROCEDURAL BACKGROUND

On January 28, 2026, [redacted], authorized representative for [redacted] (Petitioner), filed with the Director of the Department of Insurance and Financial Services a request for an external review under the Patient's Right to Independent Review Act, MCL 550.1901 *et seq*. The request for review concerns the denial of authorization for a prescription drug.

The Petitioner receives health care benefits through Health Alliance Plan of Michigan (HAP), a health maintenance organization. The benefits are described in HAP's *HMO Group Subscriber Contract* (the contract). The Director notified HAP of the external review request and asked for the information used to make its final adverse determination. HAP responded on January 29, 2026. The Director accepted the request on February 4, 2026.

The Director assigned an independent review organization (IRO) to analyze the medical issues in this appeal. The IRO submitted its report to the Director on February 13, 2026

II. FACTUAL BACKGROUND

The Petitioner has chronic migraines and experiences on average 5 severe migraine days per month and is taking Aimovig injections monthly for migraine prevention. The Petitioner has tried and failed Fioricet, sumatriptan, eletriptan, acetaminophen, naratriptan, Midrin, and tramadol. The Petitioner's

physician recommended the addition of the prescription drug Nurtec to be taken concurrently with Aimovig and asked HAP to provide coverage. HAP denied the request on the basis that HAP's criteria were not met.

The Petitioner appealed HAP's decision through its internal grievance process. At the conclusion of that process, HAP issued a final adverse determination dated January 16, 2026, affirming its coverage denial. The Petitioner now seeks the Director's review of that determination.

III. ANALYSIS

Respondent's Argument

In its final adverse determination, HAP wrote:

> After considering all available evidence, previous decisions and your medication history, the decision is to uphold the original denial for Nurtec.
>
> According to HAP's Criteria for Use of Nurtec (a medication to help manage migraines), coverage criteria are not met for the following reasons:
>
> (1) You are currently using Aimovig (last dispensed January 15, 2026) for migraine prevention and has an authorization in place through HAP for Aimovig until January 13, 2027. Per HAP's Criteria, only one CGRP-inhibitor specialty medication will be covered at one time, whether the CGRP-inhibitor is used for prevention or for acute (sudden) migraine treatment. [Calcitonin gene-related peptide (CGRP) [inhibitors] are a type of medication used to treat acute migraines (e.g., Nurtec, Ubrelvy) or prevent migraines (e.g., Ajovy, Emgality, Aimovig).]
>
> For acute migraine treatment, HAP also covers the following medications:
>
> a) Triptans (e.g., eletriptan, zolmitriptan, sumatriptan nasal spray/injection, frovatriptan, etc.);
> b) Non-steroidal anti-inflammatory (NSAID) medications (e.g., celecoxib, diclofenac, naproxen, ketorolac);
> c) Butalbital combination medications (e.g., Fioricet, Fiorinal);
> d) Acetaminophen combination medications.
>
> We received your HAP Pharmacy claims and medical records for prior and current treatments. You are currently using naratriptan, which medical visit notes dated January 6, 2026, document is helpful for acute treatment of migraine.
>
> Lastly, the provider's appeal letter includes a study with 2 participants taking Nurtec concurrently with Aimovig. However, safety and efficacy (helpfulness) has not been established by large randomized controlled clinical [trials] (considered the gold standard or benchmark for evaluating medication efficacy) for use of Nurtec in combination with another CGRP.
>
> Therefore, because criteria for coverage are not met, the decision is to uphold the original denial for Nurtec.

Petitioner's Argument

In a letter accompanying their request for external review, the Petitioner's physician wrote:

> This letter is an external appeal for Nurtec ODT 75mg PRN for patient, [the Petitioner] …. [The Petitioner] is a [redacted]-year-old female with history of chronic migraine. She currently experiences on average 5 severe migraine days per month and is taking Aimovig injections monthly for migraine prevention. In the past, she has tried the following for acute, abortive treatment of her migraines: fioricet, sumatriptan, eletriptan, acetaminophen, naratriptan, midrin, and tramadol. At this time, we would like to start her on Nurtec PRN for acute treatment for her migraines.
>
> Your denial states that Nurtec is not covered when used in conjunction with a CGRP receptor antagonist, such as Aimovig. I have provided some studies listed here that prove using a CGRP injectable for prevention with Nurtec is safe and effective treatment.
>
> A study done by Mullin and colleagues looked at 2 patients on Nurtec and Aimovig showing that the breakthrough migraines that were not controlled by Aimovig were controlled by Nurtec and that these medications together demonstrated no safety concerns. In a study by Croop et al, Nurtec was proven to be effective in patients who were already taking migraine prophylaxis therapy and helped to stop the migraines that were not controlled by preventative therapies. I urge you to consider approval for Nurtec as Aimovig is not eliminating all headaches for this patient and they still need safe and effective abortive therapy. According to the American Headache Society, all patients should be offered acute treatment if they have a migraine diagnosis, and Nurtec is the best choice for my patient.
>
> Based upon the reasoning and clinical data above, the medication Nurtec is the best option for acute treatment of [the Petitioner's] migraines. We urge you to approve Nurtec in order to provide safe and effective treatment for [the Petitioner] and improve her quality of life.

Director's Review

The Director assigned an IRO to evaluate HAP's criteria and help determine whether the prescription drug Nurtec is medically necessary for treating the Petitioner's condition. This review is required by section 11(7) of the Patient's Right to Independent Review Act, MCL 550.1911(7).

The IRO reviewer is a physician who is board certified in neurology and has been in practice for more than 14 years. The IRO reviewer's report included the following analysis and recommendation:

> **Rationale:**
>
> ***

> The [redacted] physician consultant explained that a recent study recommends daily preventative medication such as CGRP or gepants for migraine prevention(Sacco, 2022). The [redacted] physician consultant noted that global practice guidelines also list preventative medications which are recommended for anyone with migraines more than 4 times a month (Puledda, 2024).
>
> The [redacted] physician consultant explained that a recent review demonstrated that combination of gepant (Nurtec) and CGRP Ab are safe and well tolerated." The [redacted] physician consultant noted that the findings of this study demonstrate that combining CGRP mAbs with gepants is a safe and well-tolerated treatment approach for migraine."(Alsaadi, 2024). The [redacted] physician consultant indicated that there are not Food and Drug Administration (FDA) labeling contraindications to using Nurtec in conjunction with CRGP Ab. …
>
> The [redacted] physician consultant indicated that the Health Plan's criteria is not consistent with standard of care criteria. The physician consultant also indicated that the member met standard of care criteria for coverage of Nurtec ODT 75mg as needed.
>
> Pursuant to the information set forth above and available documentation, the [redacted] physician consultant determined that Nurtec ODT 75mg as needed medically necessary for treatment of the member's condition. [References omitted]The IRO reviewer recommended that the Director reverse HAP's denial of coverage.

The IRO reviewer recommended that the Director reverse HAP's denial of coverage.

The Director is not required to accept the IRO's recommendation. *Ross v Blue Care Network of Michigan,* 480 Mich 153 (2008). However, the recommendation is afforded deference by the Director. In a decision to uphold or reverse an adverse determination, the Director must cite "the principal reason or reasons why the director did not follow the assigned independent review organization's recommendation." MCL 550.1911(18)(b). The IRO's review is based on extensive experience, expertise, and professional judgment. In addition, the IRO's recommendation is not contrary to any provision of the Petitioner's certificate of coverage. MCL 550.1911(17).

The Director, discerning no reason why the IRO's recommendation should be rejected, finds that the prescription drug Nurtec is medically necessary; therefore, it is a covered benefit under the Petitioner's benefit plan.

IV. ORDER

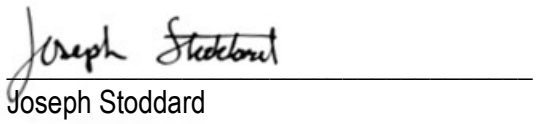
The Director reverses Health Alliance Plan of Michigan's January 16, 2026, final adverse determination. HAP shall immediately authorize coverage for the prescription drug Nurtec. See MCL 550.1911(19). HAP shall, within seven days of providing coverage, submit to the Director proof it has implemented this order.

To enforce this order, the Petitioner may report any complaint regarding its implementation to the Department of Insurance and Financial Services, Office of Appeals and Market Regulation, at this toll-free telephone number: (877) 999-6442.

This is a final decision of an administrative agency. Under MCL 550.1915, any person aggrieved by this order may seek judicial review no later than 60 days from the date of this order in the circuit court for the Michigan county where the covered person resides or in the circuit court of Ingham County. A copy of the petition for judicial review should be sent to the Department of Insurance and Financial Services, Office of Appeals and Market Regulation, Post Office Box 30220, Lansing, MI 48909-7720.

Anita G. Fox
Director

For the Director:



Joseph Stoddard
Special Deputy Director