

MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES

NOTICE OF PROPOSED POLICY

Public Act 280 of 1939, as amended, and consultation guidelines for Medicaid policy provide an opportunity to review proposed changes in Medicaid policies and procedures.

Please review the policy summary and the attached materials that describe the specific changes being proposed. Let us know why you support the change or oppose the change.

Submit your comments to the analyst by the due date specified. Your comments must be received by the due date to be considered for the final policy bulletin.

Thank you for participating in the consultation process.



Director, Program Policy Division
Bureau of Medicaid Policy, Operations, and Actuarial Services

Project Number: 2233-Pharmacy	Comments Due: October 24, 2022	Proposed Effective Date: As Indicated
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Mail Comments to: goethalsv@michigan.gov

Telephone Number: 517-335-6611 **Fax Number:**
E-mail Address: goethalsv@michigan.gov

Policy Subject: COVID-19 Response: Authorization of U.S. Food & Drug Administration (FDA) Emergency Use Authorization (EUA) of Pharmacists to Prescribe COVID-19 Oral Therapeutics

Affected Programs: Medicaid, Healthy Michigan Plan, MIChild, Maternity Outpatient Medical Services (MOMS)

Distribution: All Providers

Policy Summary: To comply with the 9th Amendment of the Public Readiness and Emergency Preparedness (PREP) Act, the Michigan Department of Health and Human Services (MDHHS) will provide reimbursement to licensed pharmacists enrolled in Medicaid who order and administer COVID-19 oral therapeutics in accordance with the FDA EUA and for beneficiary populations authorized by the FDA. This policy is effective according to the provisions as specified in the EUA.

Purpose: To increase timely access to care in providing available treatments for COVID-19.

Bulletin Number: MMP 22-29

Distribution: All Providers

Issued: September 19, 2022

Subject: COVID-19 Response: Authorization of U.S. Food & Drug Administration (FDA) Emergency Use Authorization (EUA) of Pharmacists to Prescribe COVID-19 Oral Therapeutics

Effective: As Indicated

Programs Affected: Medicaid, Healthy Michigan Plan, MIChild, Maternity Outpatient Medical Services (MOMS)

To comply with the 9th Amendment of the Public Readiness and Emergency Preparedness (PREP) Act, the Michigan Department of Health and Human Services (MDHHS) will provide reimbursement to licensed pharmacists enrolled in Medicaid who order and administer COVID-19 oral therapeutics in accordance with the FDA EUA and for beneficiary populations authorized by the FDA. This policy is effective July 6, 2022, according to the provisions specified in the EUA.

The purpose of this policy is to increase timely access to care in providing available treatments for the treatment of COVID-19. Allowing pharmacists to order authorized COVID-19 oral therapeutics for treatment will broaden access to early treatment and reduce inequities given the ease of administration.

Provider Qualifications

Pharmacy providers ordering prescriptions of approved EUA products to treat COVID-19 must:

- Hold a current, active Medicaid enrollment.
- Adhere to all requirements of the FDA EUA for oral drug products approved for ordering by pharmacists to treat COVID-19.
- Adhere to all requirements of the MDHHS FDA EUA policy, established in Bulletin [MSA 20-81](#) and the [MDHHS Medicaid Provider Manual](#) unless otherwise indicated by the Centers for Medicare & Medicaid Services (CMS).

Additional Resources for Providers:

- U.S. Department of Health and Human Services (HHS) Announcement Authorizing Pharmacists to Prescribe Paxlovid with Certain Limitations:
<https://aspr.hhs.gov/COVID-19/Therapeutics/updates/Pages/important-update-06July2022.aspx>
- FDA EUA for Paxlovid: <https://www.fda.gov/media/155049/download>
- D.0 Pharmacy Claims Processing Manual:
https://michigan.magellanrx.com/provider/external/medicaid/mi/doc/en-us/MIRx_D0_claims_processing_manual.pdf

Public Comment

The public comment portion of the policy promulgation process is being conducted concurrently with the implementation of the change noted in this bulletin. Any interested party wishing to comment on the change may do so by submitting comments to Vicki Goethals via e-mail at GoethalsV@michigan.gov.

Please include “Authorization of FDA EUA of Pharmacists to Prescribe COVID-19 Oral Therapeutics” in the subject line.

Comments received will be considered for revisions to the change implemented by this bulletin.

Manual Maintenance

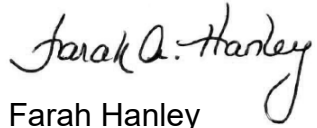
Providers should retain this bulletin until further notice of its possible continuation following the announcement of the end of the Federal Public Health Emergency, or until the discontinuation of the EUA.

Questions

Any questions regarding this bulletin should be directed to Provider Inquiry, Department of Health and Human Services, P.O. Box 30731, Lansing, Michigan 48909-8231, or e-mailed to ProviderSupport@michigan.gov. When you submit an e-mail, be sure to include your name, affiliation, NPI number, and phone number so you may be contacted if necessary. Typical Providers may phone toll-free 1-800-292-2550. Atypical Providers may phone toll-free 1-800-979-4662.

An electronic copy of this document is available at www.michigan.gov/medicaidproviders >>
Policy, Letters & Forms.

Approved

A handwritten signature in black ink that reads "Farah A. Hanley". The signature is written in a cursive style with a large, looping initial "F".

Farah Hanley
Chief Deputy for Health