



CENTER FOR MEDICARE

TO: All Part D Sponsors

FROM: Amy Larrick Chavez-Valdez, Director
Medicare Drug Benefit and C & D Data Group

SUBJECT: CY 2017 Formulary-Level Cumulative Opioid Morphine Equivalent Dose (MED)
Point-of-Sale (POS) Edit

DATE: July 21, 2016

In the CY 2017 Call Letter, CMS notified Part D sponsors of the expectation to implement formulary-level cumulative opioid edits at point-of-sale (POS) to prospectively prevent opioid overutilization. We expect Part D sponsors to implement either a soft and/or hard formulary-level cumulative opioid edit based on morphine equivalent dose (MED) at POS. Please refer to pages 212 – 214 of the CY 2017 Call Letter for detailed guidance.

This memo provides information regarding the template that Part D sponsors must utilize in the submission of the CY 2017 POS edit MED information to CMS via the Health Plan Management System (HPMS). **A completed template must be submitted to HPMS between August 1, 2016 and 5:00 PM EDT on September 1, 2016.**

A single MED template can be applied to multiple contracts. The CY 2017 HPMS Formulary Submission Module & Reports Technical Manual will be updated to include detailed HPMS submission instructions. The update will be available via the HPMS “In The News” section on July 29, 2016.

Please note that this template is solely for CMS data collection. The completion and submission of the core data elements contained within the template does not represent CMS’ approval or denial of a plan’s cumulative MED opioid POS edit. Also, CMS expects sponsors to have a written policy that CMS may request for review at any time.

MED Template Completion Instructions

The attached document is the template to be used to submit all MED POS edit data to CMS. It will also be available via HPMS upon release of the submission functionality. The following information must be included on the template and the template must not be altered in any way:

1. **Edit Type to be Implemented (Yes/No).** Select YES from the corresponding drop down if the plan will implement a hard and/or soft edit. Select NO from the corresponding drop down if the plan will not implement a hard or soft edit. If NO is chosen, the remainder of the column will be greyed out and should not be completed. YES must be selected for at least one edit type.
2. **Cumulative MED Daily Dose Threshold (mg).** Indicate the daily cumulative MED threshold in milligrams (mg) for the hard and/or soft edit. This is a free text field that accepts whole numeric values only.
3. **Number of Prescribers Included in Edit? (Yes/No).** Select YES from the corresponding drop down if a prescriber count is included in the hard and/or soft edit specifications. Select NO from the corresponding drop down if the prescriber count is not included in the hard and/or soft edit specifications. If NO is selected, the number of prescribers field below will be greyed out and should not be completed.
4. **Number of Prescribers.** In the corresponding field, specify the minimum number of opioid prescribers for the hard and/or soft edit. For example, if 3 is entered into this field, the hard and/or soft edit will trigger at POS if the member receives concurrent opioid prescriptions from 3 or more prescribers (in addition to meeting the other specifications). This is a free text field that accepts whole numeric values only.
5. **Number of Pharmacies Included in Edit? (Yes/No).** Select YES from the corresponding drop down if a number of pharmacies threshold is included in the hard and/or soft edit specifications. Select NO if the number of pharmacies threshold is not included in the hard and/or soft edit specifications. If NO is selected, the number of pharmacies field below will be greyed out and should not be completed.
6. **Number of Pharmacies.** In the corresponding field, specify the minimum number of pharmacies dispensing concurrent opioid prescriptions for the hard and/or soft edit. For example, if 3 is entered into this field, the hard and/or soft edit will trigger at POS if the member fills concurrent opioid prescriptions at 3 or more pharmacies (in addition to meeting the other specifications). This is a free text field that accepts whole numeric values only.