Hepatitis C: State of Medicaid Access Report Card

Florida



Grade	Recommendations to Improve Patient Access		
В	 Remove restrictions on retreatment. Restore transparency and parity between FFS and MCOs. Remove additional restrictions as described below. 		

State Overview

As of September 2023, 4,273,705 individuals in Florida were enrolled in Medicaid and CHIP. Florida has not expanded coverage to low-income adults.¹ As of 2016, an estimated 151,000 people were living with HCV in Florida.² As of July 1, 2022, approximately 87% of Florida Medicaid beneficiaries were enrolled in a managed care organization (MCO), with the other 13% enrolled in fee-for-service (FFS).³ Florida Medicaid contracts with 9 MCOs: Aetna Better Health, AmeriHealth, Community Care Plan, Florida Community Care, Humana, Molina HealthCare, Simply Healthcare, Sunshine Health, and UnitedHealthcare.⁴ Florida Medicaid requires MCOs to use the same PDL as FFS.⁵

The Florida Medicaid Preferred Drug List designates Mayyret, sofosbuvir/velpatasvir, and Vosevi as preferred regimens.6

Deductions		Policy	
Prior Authorization		As of March 2023, Florida Medicaid has effectively removed prior authorization for Mavyret and sofosbuvir/velpatasvir by implementing a pharmacy claims process called "Automated Prior Authorization," or "Auto PA," for treatment-naïve patients. Auto PA uses "system automated criteria [to] check for specific requirements. (e.g., diagnosis, age, previous therapies, etc.)." The Auto PA criteria for Mavyret and sofosbuvir/velpatasvir are: a hepatitis C diagnosis within the last year; patient must be at least 3 years old; and certain quantity limits apply. According to AHCA's description of the Auto PA process, "If all requirements are found, the claims will pay at the pharmacy counter without need of manual prior authorization submission."	
Fibrosis Restrictions		Florida Medicaid does not impose fibrosis restrictions. ¹⁰	
Substance Use Restrictions		Florida Medicaid does not impose substance use restrictions for treatment-naïve patients. ¹¹	
Prescriber Restrictions		Florida Medicaid does not impose prescriber restrictions. ¹²	
Retreatment Restrictions	-8	Florida Medicaid imposes substance use and adherence-based restrictions on patients who seek retreatment: For patients seeking retreatment due to "substance abuse related failure," providers must attest that the patient "is receiving substance or alcohol abuse counseling services or seeing ar addiction specialist as an adjunct to HCV retreatment and it is documented in the medical records." Further, Florida Medicaid may deny retreatment to patients who were "non-adherent to initial regimen as evidenced by medical record and/or pharmacy claims." 14	
Access in Managed Care	-8	8 out of the 9 MCOs appear to impose the same or equivalent requirements as FFS, with 1 MCO imposing more restrictions. Aetna Better Health ¹⁵ , Community Care Plan, ¹⁶ Florida Community Care, ¹⁷ Molina HealthCare, ¹⁸ Simply Healthcare, ¹⁹ Sunshine Health, ²⁰ and UnitedHealthcare ²¹ appear to impose the same requirements as FFS, and link to the Florida Agency for Health Care Administration (AHCA) Preferred Drug List, and/or the AHCA criteria. AmeriHealth appears to impose the same or equivalent requirements as FFS for treatment-naïve patients. AmeriHealth ²² instructs providers to refer to the AHCA drug prior authorization criteria for pharmacy PA requirements, and links to a prior authorization form ²³ that appears to waive prior	



		authorization for most treatment-naïve patients, stating: "If the diagnosis is on file, the recipient is 18 years or older and is treatment naïve, the claim will pay for 12 weeks of therapy without a prior authorization." However, Humana Medical Plan still appears to impose prior authorization requirements for treatment-naïve patients. Humana's description of its Medicaid offerings in Florida links to an upto-date "Humana Healthy Horizons in Florida" PDL, which does not mention Auto PA, and specifically notes that PA is required for Mavyret and sofosbuvir/velpatasvir. ²⁴ Confusingly, on the same section on the same page, Humana also links to the AHCA PDL. ²⁵		
Additional Restrictions	-2	Florida Medicaid imposes additional restrictions as follows (including for patients who qualify for Auto PA ²⁶ : • Prohibits refills for lost or stolen medications.		
Total Deductions		Total Score [100-Deductions]	Grade	
-18		82	В	

Contact Your State Officials

Medicaid Office²⁷: Tom Wallace, Deputy Secretary for Medicaid, Agency for Health Care Administration, State of Florida 2727 Mahan Drive, Mail Stop 8, Tallahassee, FL 32308; Telephone: (850) 412-4000; Email Address: thomas.wallace@ahca.mvflorida.com.

Pharmacy Services²⁸: Jesseka Forbes, PharmD, Agency for Health Care Administration, State of Florida 2727 Mahan Drive, Tallahassee, FL 32308; Telephone: (407) 245-0862; Email Address: Jesseka.forbes@ahca.myflorida.com.

Key Sources

Preferred Drug List: Agency for Health Care Administration (AHCA), Florida Medicaid Preferred Drug list (Oct. 1, 2023)

Auto-PA: AHCA Automated Prior Authorizations and Bypass Lists (Dec. 2023)

Clinical Criteria: AHCA, Hepatitis C Direct Acting Antivirals (DAA), Prior Authorization Criteria (Mar. 13, 2023)

Prior Authorization Form for Retreatment: AHCA, Florida Medicaid Prior Authorization: Hepatitis C Agents (Nov. 28, 2023)

²⁴ Humana Health Horizons in Florida, 2024 Preferred Drug List (January 2, 2024), https://perma.cc/3YSE-5W57.





¹ Centers for Medicare and Medicaid Services, Medicaid & CHIP in Florida, https://perma.cc/78QP-P9TA.

² HepVu, Local Data: Florida, https://perma.cc/LJ7Q-APRF.

³ Kaiser Family Foundation, Share of Medicaid Population Covered Under Different Delivery Systems, https://perma.cc/EMN8-QR8B.

⁴ AHCA Florida, SMMC Plan Contact: Provider Networks (Nov. 29, 2022), https://perma.cc/M5GD-GE4Z.

⁵ CMS, National Medicaid Fee-For-Service Drug Utilization Review, FFY 2022 Annual Report at 693, https://perma.cc/A84A-N7MQ.

⁶ Clinical Criteria; see also Preferred Drug List.

⁷ Preferred Drug List (describing Auto PA process, and listing Mavyret and sofosbuvir/velpatasvir as requiring only Auto PA); Clinical Criteria.

⁸ AHCA Automated Prior Authorizations and Bypass Lists.

⁹ Preferred Drug List (describing Auto PA process, and listing Mavyret and sofosbuvir/velpatasvir as requiring only Auto PA); Clinical Criteria.

¹⁰ Clinical Criteria.

¹¹ Clinical Criteria.

¹² Clinical Criteria.

¹³ Clinical Criteria.

¹⁴ Clinical Criteria.

¹⁵ Aetna Better Health of Florida, Pharmacy Prior Authorization, https://perma.cc/Z4MZ-2PGT.

¹⁶ Community Care Plan, Provider for MMA – Pharmacy, https://ccpcares.org/Providers/MMA/Pharmacy#Pharmacy.

¹⁷ Florida Community Care, Pharmacy Resources, https://perma.cc/VSF7-9UNA.

¹⁸ Molina Healthcare, Drug Formulary: Managed Medical Assistance (MMA) Preferred Drug List (PDL), https://perma.cc/BS68-RHS8.

¹⁹ Simply Healthcare, Pharmacy and Prescription Drugs: Florida Medicaid Members, https://perma.cc/3C79-BNWQ.

²⁰ Sunshine Health, Medicaid: Pharmacy, https://perma.cc/JQ9V-XP25.

²¹ UnitedHealthcare Community Plan Medicaid Lookup Tools, https://perma.cc/6PFX-QUMY.

²² AmeriHealth Caritas Florida, Prior Authorization, https://perma.cc/9073-82UD.

²³ AmeriHealth Caritas Florida, Florida Medicaid Prior Authorization, https://perma.cc/X4H5-AEUA.



²⁵ Humana Drug Lists: Florida Managed Medical Assistance Program, https://perma.cc/HT6Z-UXKC.

²⁶ Clinical Criteria.

 $^{^{27}\} Medicaid\ Director,\ National\ Association\ of\ Medicaid\ Directors,\ https://perma.cc/6RHB-4K87.$

²⁸ AHCA, Florida Medicaid Pharmaceutical and Therapeutics Committee, https://perma.cc/B5AK-ER3E; see also Procedures for Public Testimony at Pharmaceutical and Therapeutics (P&T) Committee Meetings, https://perma.cc/25X4-9FE7.