

# Hepatitis C: State of Medicaid Access Report Card

## Florida



| Grade    | Recommendations to Improve Patient Access  |
|----------|--|
| <b>B</b> | <ul style="list-style-type: none"> <li>Remove restrictions on retreatment.</li> <li>Restore transparency and parity between FFS and MCOs.</li> <li>Remove additional restrictions as described below.</li> </ul> |

### State Overview

As of January 2023, 4,924,826 individuals in Florida were enrolled in Medicaid and CHIP. Florida has not expanded coverage to low-income adults.<sup>1</sup> As of 2016, an estimated 151,000 people were living with HCV in Florida.<sup>2</sup> As of July 2, 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).<sup>3</sup> 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.<sup>4</sup> Florida Medicaid requires MCOs to “authorize requests for hepatitis C drugs in accordance with the Agency’s PDL.”<sup>5</sup>

The Florida Medicaid Preferred Drug List designates Mavyret, sofosbuvir/velpatasvir, and Vosevi as preferred regimens.<sup>6</sup>

| 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.<br><br>Auto PA uses “system automated criteria [to] check for specific requirements (e.g., diagnosis, age, previous therapies, etc.). If all requirements are found, the claims will pay at the pharmacy counter without need of manual prior authorization submission.” <sup>7</sup>   |
| Fibrosis Restrictions      |    | Florida Medicaid does not impose fibrosis restrictions. <sup>8</sup>  |
| Substance Use Restrictions |    | Florida Medicaid does not impose substance use restrictions for treatment-naïve patients. <sup>9</sup>  |
| Prescriber Restrictions    |    | Florida Medicaid does not impose prescriber restrictions. <sup>10</sup>   |
| Retreatment Restrictions   | -8 | Florida Medicaid imposes retreatment restrictions. Patients seeking retreatment are not eligible for the Auto PA process, and manual submission of a clinical prior authorization is required. 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 an addiction specialist as an adjunct to HCV retreatment and it is documented in the medical records.” <sup>11</sup> Further, Florida Medicaid may deny retreatment to patients who were “non-adherent to initial regimen as evidenced by medical record and/or pharmacy claims.” <sup>12</sup>   |
| Access in Managed Care     | -8 | 5 MCOs (Community Care Plan, <sup>13</sup> Florida Community Care, <sup>14</sup> Molina HealthCare, <sup>15</sup> Simply Healthcare, <sup>16</sup> and UnitedHealthcare <sup>17</sup> ) 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.<br><br>4 MCOs (Aetna Better Health, AmeriHealth, Humana Medical Plan, and Sunshine Health) also link to the AHCA Preferred Drug List. However, these plans also publish contradictory plan documents on their websites that appear to still impose prior authorization requirements for treatment-naïve patients.<br><br>Aetna Better Health notes, “we use the criteria set by the AHCA <u>along with our custom prior authorization guidelines</u> to make decisions about PA,” <sup>18</sup> and links to a prior authorization form that does not reference Auto PA and appears to impose the following restrictions on treatment-naïve patients: genotype, documentation of chronic diagnosis, and HCV RNA within the last 6 months. <sup>19</sup> |

|                                |   |   |
|--------------------------------|---|---|
|                                |   | AmeriHealth <sup>20</sup> still links to a prior authorization form <sup>21</sup> that does not mention Auto PA and appears to impose a prescriber consultation requirement, a one-month abstinence and substance use counseling requirement, documentation of genotype, documentation of chronic diagnosis, and HCV RNA within the last 3 months. Humana links to both the AHCA Medicaid PDL and its own “Humana Healthy Horizons” PDL, <sup>22</sup> which does not mention Auto PA, and notes that PA is required for Mavyret and sofosbuvir/velpatasvir. <sup>23</sup> Sunshine Health links to the AHCA Medicaid PDL, <sup>24</sup> but also continues to publish older hepatitis C criteria that appear to impose prior authorization on treatment-naïve patients, including documentation of genotype. <sup>25</sup> |
| Additional Restrictions        | -2  | Florida Medicaid imposes additional restrictions as follows (including for patients who qualify for Auto PA): <ul style="list-style-type: none"> <li>Prohibits refills for lost or stolen medications.<sup>26</sup></li> </ul>  |
| <b>Total Deductions</b><br>-18 | <b>Total Score [100-Deductions]</b><br>82 |   |
|                                |   | <b>Grade</b><br>B   |

## Contact Your State Officials

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## Key Sources

**Preferred Drug List:** [Agency for Health Care Administration \(AHCA\). Florida Medicaid Preferred Drug list \(Apr. 1, 2023\)](#)

**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 \(Mar. 13, 2023\)](#)

<sup>1</sup> Centers for Medicare and Medicaid Services, Medicaid & CHIP in Florida, <https://perma.cc/VBW9-HUAN>.

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

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

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

<sup>5</sup> AHCA, SMMC Contract Interpretation: 16-01, RE: Coverage and Authorization of Hepatitis C Prescribed Drugs (May 5, 2016) <https://perma.cc/F75A-B58T>; see also AHCA, Statewide Medicaid Managed Care (SMMC) Policy Transmittal 16-12, RE: Drug Prior Authorization Criteria Change for Treatment of Hepatitis C (May 27, 2016) <https://perma.cc/8DGG-GK76>.

<sup>6</sup> Clinical Criteria; see also Preferred Drug List.

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

<sup>8</sup> Clinical Criteria.

<sup>9</sup> Clinical Criteria.

<sup>10</sup> Clinical Criteria.

<sup>11</sup> Clinical Criteria.

<sup>12</sup> Clinical Criteria.

<sup>13</sup> Community Care Plan, Provider for MMA – Pharmacy, <https://ccpcare.org/Providers/MMA/Pharmacy#Pharmacy>.

<sup>14</sup> Florida Community Care, Pharmacy Resources, <https://perma.cc/TA4N-KZ96>.

<sup>15</sup> Molina Healthcare, Drug Formulary: Managed Medical Assistance (MMA) Preferred Drug List (PDL), <https://perma.cc/TN2H-FADV>.

<sup>16</sup> Simply Healthcare, Pharmacy and Prescription Drugs: Florida Medicaid Members, <https://perma.cc/Z7LG-9VGR>.

<sup>17</sup> UnitedHealthcare Community Plan Medicaid Lookup Tools, <https://perma.cc/RSB8-GNG2>.

<sup>18</sup> Aetna Better Health of Florida, Pharmacy Prior Authorization, <https://perma.cc/79ES-WVBP>.

<sup>19</sup> Aetna Better Health of Florida, Hepatitis C Agents (May 4, 2023), <https://perma.cc/H23S-YFQS>.

<sup>20</sup> AmeriHealth Caritas Florida, Prior Authorization, <https://perma.cc/NS36-RDCZ>.

<sup>21</sup> AmeriHealth Caritas Florida, Florida Medicaid Prior Authorization, <https://perma.cc/23UN-DHZ3>.

<sup>22</sup> Humana Drug Lists: Florida Managed Medical Assistance Program, <https://perma.cc/KQK5-T5JG>.

<sup>23</sup> Humana Health Horizons in Florida, 2023 Preferred Drug List (May 18, 2023), <https://perma.cc/5BEJ-QPWA>.

<sup>24</sup> Sunshine Health, Medicaid: Pharmacy, <https://www.sunshinehealth.com/members/medicaid/benefits-services/pharmacy.html> (accessed May 18, 2023).

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<sup>25</sup> Sunshine Health, Prior Authorization Criteria: Hepatitis C Direct Acting Antivirals (DAA) (April 22, 2022), <https://perma.cc/FR2K-MZZ4>.

<sup>26</sup> Clinical Criteria.

<sup>27</sup> Medicaid Director, National Association of Medicaid Directors, <https://perma.cc/2PWX-H946>.

<sup>28</sup> AHCA, Florida Medicaid Pharmaceutical and Therapeutics Committee, <https://perma.cc/82FN-DZKP>; see also Procedures for Public Testimony at Pharmaceutical and Therapeutics (P&T) Committee Meetings, <https://perma.cc/25X4-9FE7>.