

Hepatitis C: State of Medicaid Access Report Card

Puerto Rico



Grade	Summary
A	<p>Liver Damage (Fibrosis) Restrictions: Puerto Rico does not have any liver damage restrictions.</p> <p>Sobriety Restrictions: Puerto Rico does not impose sobriety restrictions.</p> <p>Prescriber Restrictions: Puerto Rico allows primary care physicians to prescribe treatment.</p> <p>Recommendations to Improve Patient Access:</p> <ul style="list-style-type: none">Remove the prior authorization requirement for treatment-naïve individuals. <p><i>Grade Rationale: Puerto Rico has taken steps to formally include pan-genotypic hepatitis C treatment in the island's managed care program that covers all beneficiaries, where previously treatment was only available through a pilot treatment program. Beneficiaries are now able to access hepatitis C at any liver damage level and without regard to past or present drug and/or alcohol use. Additionally, Puerto Rico has relaxed its prescriber restrictions by allowing primary care providers to prescribe treatment so long as they have completed a hepatitis C management and treatment course. By removing the prior authorization requirement for treatment-naïve individuals, Puerto Rico could significantly increase their access to hepatitis c treatment.</i></p>

Background

As December 2020, 1,162,631 people were enrolled in Medicaid in Puerto Rico.¹ The Medicaid program is part of a larger public government health care delivery system that provides care to most of the island's population. The Puerto Rico Department of Health is a single state agency, which has a cooperative agreement with the *Administración de Seguros Salud de Puerto Rico* (ASES, Puerto Rico Health Insurance Administration).² ASES implements and administers the island-wide health insurance system. Approximately half of Puerto Rico's 3.5 million residents depend on the public health system for their medical care.³ ASES administers an island-wide Managed Care Organization (MCO) program, where beneficiaries have the choice of four MCOs providing the same suite of benefits⁴: First Medical Health Plan, MMM Multi Health, Plan de Salud Menonita, and Triple-S Salud.⁵ This program is referred to as *El Plan de Salud VITAL* (VITAL Health Plan).

State of Medicaid Hepatitis C Treatment Access

Previously, hepatitis C treatment was not included in the island's Medicaid program. On March 26, 2020, ASES *Director Ejecutivo* (Executive Director) Jorge E. Galva issued a letter to all MCOs, pharmacies, and providers participating in the VITAL Plan. This letter mandates that the direct-acting antiviral treatment Mavyret is included in the VITAL plan, and sets guidelines for providers.⁶ Subsequently, ASES published a uniform protocol for coverage of hepatitis C treatment along with an updated prior authorization form.⁷ Beneficiaries with chronic hepatitis C at any liver damage level qualify for treatment. While the protocol and form direct the treating physician to ensure the that patient is ready to initiate treatment, it does not require physicians to screen specifically for alcohol and/or drug use and specifies that "[r]ecent or active drug use is not a contraindication for treatment."⁸ Additionally, the protocol specifies that any general or primary care physician is authorized to prescribe treatment for "non-complicated patients" so long as they have taken a hepatitis C management and treatment course "offered by Empire Liver Foundation or similar organization ,presenting appropriate certification."⁹

As the March 26 letter indicates, the VITAL plan's formulary (*Formulario de Medicamentos en Cubierta del Plan de Salud Vital*) only includes coverage of Mavyret, however the letter indicates that in the event of a patient's contraindication to Mavyret, the plan will consider the most cost-effective treatment under an exceptions process.¹⁰

Liver Damage (Fibrosis) Restrictions

Puerto Rico does not impose liver damage restrictions.

Sobriety Restrictions

Puerto Rico does not impose sobriety restrictions.

Prescriber Restrictions

Puerto Rico allows primary care physicians to prescribe treatment.

Points of Contact for Questions & Concerns about Puerto Rico's State of Medicaid Hepatitis C Access

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¹ Statistics, Eligibility Cases, Departamento de Salud Programa Medicaid: <https://www.medicaid.pr.gov/Info/Statistics/>

² Puerto Rico: Medicaid Overview, Medicaig.gov: <https://www.medicaid.gov/medicaid/by-state/puerto-rico.html>

³ Puerto Rico: Medicaid Overview, Medicaig.gov: <https://www.medicaid.gov/medicaid/by-state/puerto-rico.html>

⁴ Questions and answers: Benefits Coverage, Vital: <https://www.planvitalpr.com/cubierta-de-beneficios>

⁵ Contracted Insurers, ASES: <https://www.asespr.org/i/proveedores-2/contratos/>

⁶ ASES, *Carta Normativa 20-0326: Inclusión de Mavyret al Formulario de Medicamentos en Cubierta* (Regulatory Letter 20-0326: Inclusion of Mavyret in the Formulary of Covered Medications), March 26, 2020: <https://www.asespr.org/i/proveedores-2/comunicados/cartas-normativas/>

⁷ ASES, VITAL Policy for the Management of Patients Diagnosed with Chronic Hepatitis C: <https://app.box.com/v/protocolosases/file/748224470661>. (en Español: <https://app.box.com/v/protocolosases/file/748224702348>)

⁸ ASES, VITAL Policy for the Management of Patients Diagnosed with Chronic Hepatitis C: <https://app.box.com/v/protocolosases/file/748224470661>. (en Español: <https://app.box.com/v/protocolosases/file/748224702348>)

⁹ ASES, VITAL Policy for the Management of Patients Diagnosed with Chronic Hepatitis C: <https://app.box.com/v/protocolosases/file/748224470661>. (en Español: <https://app.box.com/v/protocolosases/file/748224702348>)

¹⁰ ASES, VITAL Policy for the Management of Patients Diagnosed with Chronic Hepatitis C: <https://app.box.com/v/protocolosases/file/748224470661>. (en Español: <https://app.box.com/v/protocolosases/file/748224702348>). See also ASES, *Carta Normativa 20-0326: Inclusión de Mavyret al Formulario de Medicamentos en Cubierta* (Regulatory Letter 20-0326: Inclusion of Mavyret in the Formulary of Covered Medications), March 26, 2020: <https://www.asespr.org/i/proveedores-2/comunicados/cartas-normativas/>