

CMS Guidance Related to COVID-19 A Bulletin from Molina Healthcare

April 29, 2020

Updates for Molina Medicare

Re: Molina Medicare Advantage HMOs and Medicare-Medicaid Plan (MMP) providers (collectively, "Molina Medicare") - The following outlines key COVID-19 requirements and changes to Molina Medicare's business rules as a result of the national public health emergency period.

The following is the *fourth* of ongoing communications to summarize Molina Medicare changes to provide ease of access to care for your patients and our members.

This communication features information on prescription drug benefit access for your patients.

- 1. <u>Emergency access to prescriptions for Medicare Members (Related to 4/21/2020</u> <u>HPMS Memo</u>)
 - **CMS Requirement:** Members must have adequate access to covered Part D drugs dispensed at out-of-network pharmacies. Cost sharing and additional charges (i.e., the out-of-network pharmacy's usual and customary charge), if any, that exceed the plan allowance remain the member's responsibility.
 - Existing Molina Medicare Business Rule: The national pharmacy network is available for Molina Medicare members to fill emergency prescriptions. Members that paid out-of-pocket for prescriptions at out-of-network pharmacies can submit a request for reimbursement for any portion that they paid that was outside of the member's responsibility. Member reimbursements will be issued minus any applicable cost-share amounts.
 - 2. <u>Prescription Benefits for Medicare Members (Related to 4/21/2020 HPMS Memo)</u>
 - CMS Requirement:
 - Plan must relax "Refills-Too-Soon" Edits while providing Medicare Advantage and Part D sponsors flexibility on how safety edits are applied as long as access to Part D drugs is provided at the point-of-sale.
 - 2. Plans must permit enrollees to obtain the totals supply prescribed for a covered Part D Drug up to a 90-day supply in one fill or refill.
 - New Molina Medicare Business Rule (effective March 1, 2020):
 - 1.Molina has relaxed the Refill Too Soon edits while retaining safety edits as applicable.
 - 2. Members have access to get up to a 90-day supply for their Part D prescriptions upon request. The emergency guidance aligns with Molina's existing 90-day supply policy.

Molina Healthcare is monitoring COVID-19 developments daily. We will update you as things change and encourage you to monitor the CDC website: <u>https://www.cdc.gov/coronavirus/2019-ncov/index.html</u>

The Centers for Medicare & Medicaid Services (CMS) continues to release guidance for health care providers to follow during the National State of Emergency, including special requirements for Medicare Advantage Organizations (MAOs) and MMP's¹ during a disaster, or emergency related to Parts A/B, Part D and Supplemental Part C benefit access.

Additional COVID-19 Emergency and Disaster Guidance is published on the CMS website at the following link: <u>https://www.cms.gov/files/document/hpms-memo-covid-information-plans.pdf</u>

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¹ For MMP plans, this guidance only applies to Medicare services under a Molina MMP plan.