

MEDICAID POLICY INFORMATION SHEET

Policy Analyst: Vicki Goethals

Phone Number:

Initial

Public Comment

Final

Brief description of policy:

This bulletin describes the termination of several COVID-19 pharmacy policies, including coverage for FDA EUA monoclonal antibody injections by pharmacy providers, stand-alone vaccine counseling services billed as Medication Therapy Management (MTM) claims, and pharmacist prescriptive authority to order oral antivirals for the treatment of COVID-19 under the PREP Act. Termination of coverage and reimbursement outlined with the policy is effective for dates of service on and after October 1, 2024. These terminations were previously announced in bulletin MMP 23-27.

Reason for policy (problem being addressed):

Mandatory Medicaid coverage of certain COVID-19 treatments and services specified under the American Rescue Plan Act of 2021 (ARP) ends September 30, 2024. Due to the reduction in public emergency conditions, MDHHS has chosen not to extend these special coverages.

Budget implication:

budget neutral

will cost MDHHS \$ _____, and (select one) budgeted in current appropriation

will save MDHHS \$ Unknown

Is this policy change mandated per federal requirements?

Yes, these authorities granted per ARP end after September 30, 2024.

Does policy have operational implications on other parts of MDHHS?

No

Does policy have operational implications on other departments?

No

Summary of input:

controversial (Explain)

acceptable to most/all groups

limited public interest/comment

Supporting Documentation:

State Plan Amendment Required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Public Notice Required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes, please provide status: <input type="checkbox"/> Approved <input type="checkbox"/> Pending <input type="checkbox"/> Denied	If yes, Submission Date:
Date: _____ Approval	Date: _____

DRAFT FOR PUBLIC COMMENT Michigan Department of Health and Human Services		
	Project Number: 2424-Pharmacy	Date: July 11, 2024

Comments Due: August 15, 2024

Proposed Effective Date: October 1, 2024

Direct Comments To: Vicki Goethals

Address:

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<p>Policy Subject: End of the Federal Public Health Emergency and Final Unwinding of Pharmacy COVID-19 Response Policies</p> <p>Affected Programs: Medicaid, Healthy Michigan Plan, MICHild, Maternity Outpatient Medical Services (MOMS), Children’s Special Health Care Services (CSHCS)</p> <p>Distribution: All Providers</p> <p>Summary: This policy concludes three temporary COVID-19 Medicaid Pharmacy provisions due to the COVID-19 public health emergency (PHE), declared under Section 319 of the Public Health Service Act: bulletin HASA 22-02, MMP 22-29, and letter L 22-04.</p> <p>Purpose: Budget Saving</p> <p>Cost Implications: Budget Saving</p> <p>Potential Hearings & Appeal Issues: Aware of None</p>

State Plan Amendment Required: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, date submitted:	Public Notice Required: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Submitted date:
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Tribal Notification: Yes No - **Date:**

THIS SECTION COMPLETED BY RECEIVER

<input type="checkbox"/> Approved	<input type="checkbox"/> No Comments
<input type="checkbox"/> Disapproved	<input type="checkbox"/> See Comments Below
	<input type="checkbox"/> See Comments in Text

Signature:	Phone Number
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Signature Printed:

Bureau/Administration <i>(please print)</i>	Date
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Proposed Policy Draft

Michigan Department of Health and Human Services
Behavioral & Physical Health and Aging Services Administration

Distribution: All Providers

Issued: August 30, 2024 (Proposed)

Subject: End of the Federal Public Health Emergency (PHE) and Final Unwinding of Pharmacy COVID-19 Response Policies

Effective: October 1, 2024 (Proposed)

Programs Affected: Medicaid, Healthy Michigan Plan, MICHild, Maternity Outpatient Medical Services (MOMS), Children's Special Health Care Services (CSHCS)

Due to the COVID-19 public health emergency (PHE), the Michigan Department of Health and Human Services (MDHHS) issued several COVID-19 pharmacy policies during the declared period of the PHE. This bulletin notifies providers of the intent to discontinue the remaining COVID-19 pharmacy coverage and reimbursement policies.

This policy concludes three temporary COVID-19 Medicaid Pharmacy provisions due to the COVID-19 PHE, declared under Section 319 of the Public Health Service Act: Bulletin [HASA 22-02](#), [MMP 22-29](#), and letter [L 22-04](#). These provisions were extended in Sections 9811 and 9821 of the American Rescue Plan Act of 2021 (ARP) for coverage of COVID-19 treatment services, and declared in bulletin [MMP 23-27](#). As defined by the ARP, the policy provisions below were extended effective for dates of service on and after March 11, 2021, through the last day of the first calendar quarter that begins one year after the last day of the PHE period described in Section 1135(g)(1)(B) of the Social Security Act, which is September 30, 2024.

MDHHS is concluding the process of unwinding these provisions as the authorities for these policies expire.

- [HASA 22-02](#) - Authorization of U.S. Food & Drug Administration (FDA) Emergency Use Authorization (EUA) pharmacist prescriptive authority of oral antivirals for the treatment of COVID-19;
- [MMP 22-29](#) - Coverage of FDA EUA COVID-19 monoclonal antibody injections by pharmacy providers; and
- [L 22-04](#) - Stand-alone vaccine counseling services billed as a Medication Therapy Management service.

Following the expiration of the ARP defined effective period dates, Medicaid pharmacy requirements will revert to existing Medicaid policies and State Plan authorities.