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January 6, 2023

Dr. Michael Genord Health Alliance Plan of Michigan Henry Ford Health System 2850 W. Grand Blvd. Detroit, MI 48202

Re: MISAM's Concerns About Health Alliance Plan of Michigan's Buy and Bill Only Policy for Injectable Medication for Addiction Treatment (MAT)

Dear Dr. Genord,

On behalf of the Michigan Society of Addiction Medicine (MISAM), the medical specialty society representing physicians and clinicians in Michigan who specialize in the prevention, treatment, and recovery from addiction, thank you for the opportunity to comment on this important topic. The addiction and overdose epidemic continues to significantly impact our state. To best serve the needs of people with addiction, it is imperative to expand access to evidence-based treatments for substance use disorder (SUD), including all Food and Drug Administration (FDA)-approved forms of medication for addiction treatment (MAT). Therefore, we are greatly concerned by your plan's policy to cover injectable MAT solely through buy and bill. We fear that this change will restrict patient access to life-saving medications.

As such, we urge that you reconsider this policy and expand coverage to add a specialty pharmacy benefit for injectable MAT.

MAT has been shown to improve patient survival, increase retention in treatment, decrease illicit opiate use and other criminal activity among people with SUD, and increase patients' ability to gain and maintain employment. However, restrictive insurance policies such as buy and bill constrain these positive effects, increasing the likelihood of detrimental health outcomes. This revised policy would require practitioners to first purchase the injectable medication, and then later seek reimbursement once the drug is administered. As such, buy and bill imposes significant financial burdens on addiction treatment providers, many of whom already operate on low profit margins. It also potentially disincentivizes the prescribing of injectable medications, including for patients who may have a more favorable prognosis with injectable medications over other non-injectable medications. Thus, MISAM requests that this policy be revised to permit a specialty pharmacy benefit. These FDA-approved medications must be readily available for patients with the appropriate clinical indications without restrictive utilization management policies that impact patient access.

Delays and uncertainty in receiving medications significantly impact patient outcomes. Truthfully, in addiction treatment, a delay of just one day can be the difference between life and death. One day is enough time for a patient to return to use, suffer an overdose, or encounter a myriad of other experiences that can adversely affect their treatment outcome. Additionally, it is well established that far too few individuals who need treatment for SUD actually receive such

treatment.ⁱⁱⁱ Therefore, it is critical that insurers take steps to maximize treatment participation by eliminating unneccasary barriers.

Our organization would like to continue this diologue and work with you to improve the policy. As such, please do not hesitate to contact me at polandc2@msu.edu if there is any further input that we can provide. We look forward to hearing more information from you.

Sincerely,

Lewei (Allison) Lin, MD, MS

President-Elect, Michigan Society of Addiction Medicine

Cara A. Poland, MD, MEd, DFASAM

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Advocacy Chair, Michigan Society of Addiction Medicine

CC: Peter Watson, VP of Clinical Operations & Strategy Natalie Pirkola, VP of Ambulatory Clinical Pharmacy Services Tony Petitta, VP Pharmacy Care Management Charles Bloom, Chief Medical Officer

ⁱ Substance Abuse and Mental Health Services Administration. (2022). Medication-Assisted Treatment (MAT). SAMHSA.gov. https://www.samhsa.gov/medication-assisted-treatment

ii American Medical Association. (2022). 2021 AMA prior authorization (PA) physician survey. American Medical Association. https://www.amaassn.org/system/files/prior-authorization-survey.pdf

iii Substance Abuse and Mental Health Services Administration. (2020). Key Substance Use and Mental Health Indicators in the United States: Results from the 2019 National Survey on Drug Use and Health. SAMHSA.gov. https://www.samhsa.gov/data/report/key-substance-use-and-mental-health-indicators-united-states-results-2015-national-survey