



Weekly Bulletin – September 8, 2023

Let's Grow the Florida Alliance for Healthcare Value Together! **ACTION ITEM**

Employer members, we need your help!

Please review the current list of our Affiliate Members below. If there are benefits consultants, healthcare vendors, and/or point solution providers that you work with that are not on this list, please let us know so that we can reach out to them together about joining the Florida Alliance. Please email Karen van Caulil at karen@flhealthvalue.org with the names and contacts of any potential member organizations.

We can keep employer member dues down if we have more affiliate members!

Florida Alliance Affiliate Members

Acorda Therapeutics	Marathon Health
AffirmedRx	MedWatch
benefitSMART	MedWorks Consulting
Centivo	Merck
EHIM powered by ProCare Rx	Novo Nordisk
Embold Health	OneDigital
<i>fin</i> Health	PatientRightsAdvocate.org
Gallagher Benefit Services	PeopleOne Health
Genentech	Pfizer
GRAIL	Primasun
Green Imaging	Progyny
Grooms Benefit Solutions	Sanofi
Health Plans Inc.	Truveris
Hinge Health	Ventegra
Imagine Health	Vida Health
International Foundation of Employee	Virgin Pulse
Benefit Plans	Visana Health
Jazz Pharmaceuticals	WeCare tlc
Johnson & Johnson	WellDyne

We are also interested in expanding our Healthcare Advisory Council membership. Below are the current health plans and healthcare systems that comprise our advisory council. **If the health plan you work with and/or the healthcare systems your plan members utilize is not yet a member of the Florida Alliance, let's work together to bring them onboard.** In some cases, like for UnitedHealth Group and Cigna, their memberships expired over the summer. We need your help and encouragement to bring them back. Again, please reach out to Karen with your contacts. Thank you!

Healthcare Advisory Council Members

AdventHealth Cleveland Clinic Florida Blue	Memorial Healthcare System Nemours Children's Hospital Orlando Health
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WHAT'S NEW THIS WEEK?

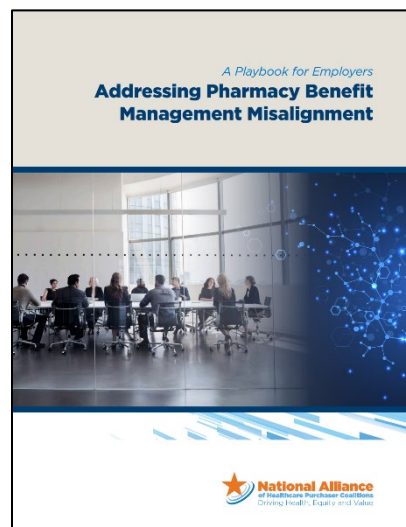
Follow up: "Employer Activation to Improve Pharmacy Benefit Management"

On Thursday, September 7, Florida Alliance President and CEO Karen van Caulil moderated a panel at the 2023 PBMI Annual National Conference entitled "**Employer Activation to Improve Pharmacy Benefit Management.**" Karen was joined by National Alliance of Healthcare Purchaser Coalitions CEO Mike Thompson and Cora Opsahl, the Director of the 32BJ Health Fund, a self-funded plan that provides coverage to 200,000 union members and their families.

Karen, Mike, and Cora talked about the recently released PBM Playbook that we have written about in past Weekly Bulletins and focused on employers' Top 10 PBM concerns. It was a brave move to have that conversation with the PBM industry in the audience! **Their goal was to have the PBM industry understand that employers are the fiduciary in their drug purchasing arrangements and they must have greater transparency and accountability than they currently do in order to ensure they are paying a fair price for drugs.** Message received!

To see the Top 10 list of concerns and the slides presented, click [HERE](#). To see the playbook again, click [HERE](#).

Please contact Karen van Caulil at karen@flhealthvalue.org if you have any questions.





Employer Member Educational Programs, Reports, Resources, And Employer Learning Collaboratives (ELC)

Employer Member Benefit: Complimentary Webinar Series from The Leapfrog Group – *Diagnostic Safety and Quality Webinar Series: Overview and Implications for Hospitals*



The Leapfrog Group is offering a webinar series, free of charge, that will **educate employers on diagnostic errors and their impact on hospital care.** Diagnostic errors can be both financially and personally devastating to employers and their covered members. This series will provide a variety of free resources and actionable strategies employers can implement when engaging hospital systems and facilities to improve hospital safety and cut down on costly errors and unnecessary healthcare costs.

Included in this series will be examples of how leading hospitals have made the reduction of diagnostic errors a priority as well as lessons learned. Each webinar will include a presentation from a leading researcher in the field of diagnostic safety and quality and include opportunities for questions and discussion.

Webinar #1: *The Fundamentals of Diagnostic Errors in Hospitals* – September 12, 3:00PM-4:00PM ET

Webinar #2: *Resources and Strategies to Improve the Safety and Quality of Diagnosis in Hospitals* – October 18, 3:00PM-4:00PM ET

Webinar #3 – *Case Study in Improving the Safety and Quality of Diagnosis in Hospitals* – November 28, 3:00PM-4:00PM ET

Each webinar requires separate registration. Please click [HERE](#) for more information and to register for each of the webinars in the series.

If you have any questions, please contact Ashley Tait-Dinger at ashley@flhealthvalue.org

Employer Member Benefit: Resource - Behavioral Health Vendor Engagement Template

The National Alliance has provided a Vendor Engagement Template which supplements questions that could be included in ongoing mental health vendor management discussions. The idea behind this document came from the development of the “Voice of the Purchaser” survey which many of you participated in earlier this year. Some of the items in the document will look familiar!

The goal of the template is to help employers and other plan sponsors address issues of mental health access and quality, which are foundational to employer health strategy.



To view the document, click [HERE](#).

If you have any questions, please contact Karen van Caulil at karen@flhealthvalue.org

Employer Member Benefit: Complimentary Webinar – Accelerating Health Equity Across the Supply Chain (Employer Town Hall) – Thursday, September 21, 12:00PM – 1:30PM (ET)

Taking action to improve health equity for employees and their families, this town hall will focus on ways employers can work with supply chain partners to integrate health equity and inclusion into daily practices to improve patient engagement and outcomes.

Meet the Panelists

				
Dr. Rachel Harrington National Committee for Quality Assurance (NCQA)	Vittoria Lecomte Sesh	Dr. Karen Mancera-Cuevas National Health Council	Carol McBride Mr. Cooper Group	George Robinson UPMC Health System

Click [HERE](#) to register.

Please contact Lisa Hain at lisa@flhealthvalue.org if you have any questions.

Employer Member Benefit: Health Policy Brief – Mental Health Parity Regulations Update

This new *Health Policy in Transit Brief* addresses the recently proposed rules and **additional guidance on compliance with the Mental Health Parity and Addiction Equity Act** set forth by the U.S. Departments of Treasury, Labor and Health and Human Services.

To read the *Health Policy in Transit* Brief, click [HERE](#).

To view all *Health Policy in Transit* Briefs, visit our Policy Briefs webpage by clicking [HERE](#).

Please contact Lisa Hain at lisa@flhealthvalue.org if you have any questions.

August 29, 2023

Health Policy in Transit
A Purchaser Viewpoint

National Alliance
of Business Related Coalitions
for Health, Equity and Value

Mental Health Parity Regulations Update

On July 25, the U.S. Departments of Treasury, Labor and Health and Human Services (the "tri-agencies") released new proposed rules and additional guidance on compliance with the Mental Health Parity and Addiction Equity Act (MHPAEA). The proposed regulations amend the current MHPAEA final regulations (issued in 2013) and are focused on requirements related to nonquantitative treatment limitations (NQTLS) (e.g., prior authorization) imposed on mental health and substance use disorder benefits, as compared to medical/surgical benefits.

The proposed regulations include several new requirements, including:

- Prohibit NQTLS with respect to mental health and substance use disorder benefits unless (1) the NQTL is no more restrictive than 40% of MCO benefits; (2) the plan or issuer satisfies requirements related to the design and application of the NQTL; and (3) the plan or issuer (or its) evaluates, and considers the impact of relevant data on access to MHPAEA benefits relative to access to MCO benefits, and subsequently takes reasonable action as necessary to address any material differences in access shown in the data to ensure compliance with MHPAEA.
- Review a modified, non-exhaustive list of NQTLS, including standards related to network composition, such as methods for determining reimbursement rates, standards for provider and facility admission to participate in a network, credentialing standards, and network adequacy procedures.
- Complete a comparative analysis to include: (1) a description of the NQTL; (2) the identification and review of the factors used to design or apply the NQTL; (3) a description of how factors are used in the design or application of the NQTL; (4) a demonstration of comparability and stringency, as written; (5) a demonstration of comparability and stringency in operation; and (6) findings and conclusions.
- Under the RFRM, no new opt outs would be permitted on or after June 27, 2023.

Additional guidance comes in three main documents:

- A [policy update](#) that sets out principles and seeks public comment to inform future guidance on the proposed requirements related to the impact of NQTLS on access and parity for mental health and substance use disorder benefits.
- The [2023 MHPAEA Report to Congress](#), which describes recent enforcement efforts related to the NQTL comparative analyses required by CAA 2023.
- The [Final Rule: 2023 MHPAEA Enforcement Plan](#), which gives a general overview of the tri-agencies' mental health parity enforcement efforts and findings for the 2023 fiscal year.

The net impact of these proposed MHPAEA regulations on employers:

- Clarifies that lack of parity in mental health and substance use disorder access directly impacts plan sponsor MHPAEA compliance requirements.
- Substantively increases and better defines employer compliance requirements.
- Significantly restricts NQTL practices (e.g., utilization management, reimbursement) that may directly or indirectly impact access.

Plan sponsors will be highly dependent on their TRM to help them to meet these requirements. Compliance requirements may be even more challenging where different TRM administrator, MHPAEA and M/S benefits and where MHPAEA access issues persist.

In support of discussions with MHPAEA TRMs, plan sponsors should consider using the following tools:
[MHPAEA Health Plan Compliance Checklist](#), [MHPAEA Health Plan Review Tool](#)

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In Case You Missed It

CVS Launches New Company to Produce Biosimilars for the US Market



CVS announced it has launched a new company called Cordavis. **This new company will work directly with manufacturers to commercialize and co-produce biosimilar medicines for the U.S. market.** One of their initial efforts will be partnering with Novartis' Sandoz unit to market the arthritis medication **Hyromiz at one-fifth the price of Humira.**

This announcement is a direct response to concerns raised over rising drug prices as well as the roles PBMs have played in negotiating drug prices. Mark Cuban's Cost Plus Drugs partnered with Coherus BioSciences to market their Humira biosimilar for less than \$600 a month.

The Reuters article can be accessed [HERE](#).

Please contact Karen van Caulil at karen@flhealthvalue.org if you have any questions.