



Pharmacy Benefits and MHPAEA Related Concerns

Joint Meeting: MHPAEA (B) Working Group and
Prescription Drug Coverage (B) Working Group

Wednesday, August 12, 2026
Columbus, Ohio



Presenter

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The INS Companies

Objectives

- Prescription Drug Formularies and Development
- Pharmacy vs Medical Benefits
- MHPAEA related findings
- Prospective Utilization Management Techniques

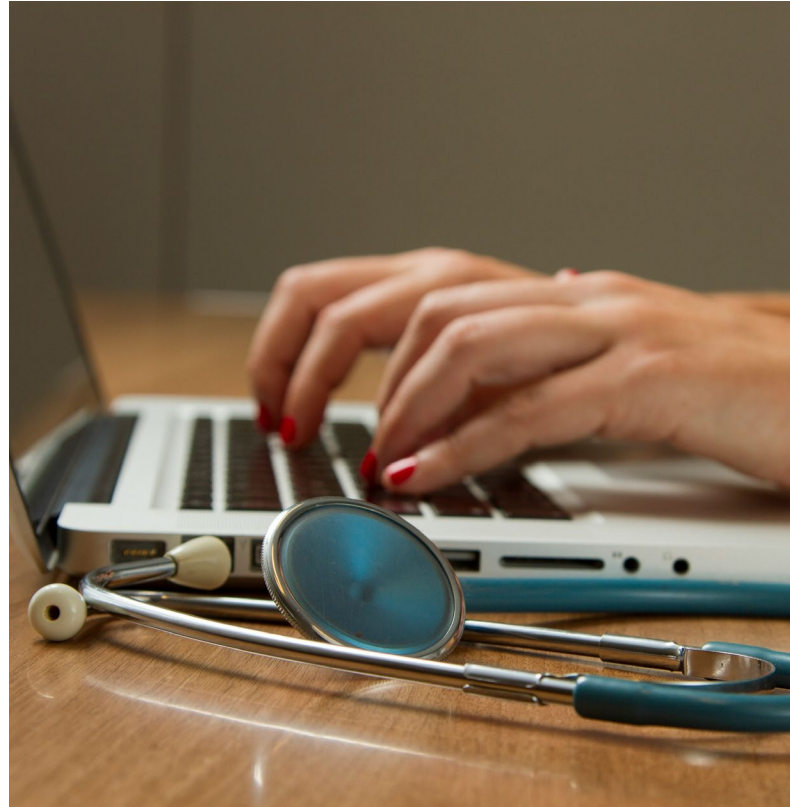
Prescription Drug Formularies

- Who is developing and administering the formularies?
- Are formularies developed with state mandates in mind?
- When a health plan makes wants to implement a change, what's next?
- Is there a monetary penalty when not using the templated formulary administered by the PBM?



Pharmacy vs. Medical Benefits

- Prescription medications may be covered by a member's pharmacy benefits, medical benefits, or both.
 - How is this communicated?
- **Specific medications include:**
 - Substance Use Disorder
 - Sublocade
 - Brixadi
 - Vivitrol
 - Mental Health
 - Invega Sustenna
 - Spravato
 - Zulresso



Mental Health Parity Related Findings

➤ Substance Use Disorder Prospective Utilization Management Techniques

- Prior Authorization
- Step Therapy
- Quantity Limits

➤ Tiering concerns

➤ Medications include:

- Suboxone films (buprenorphine/naloxone)
- Zubsolv films (buprenorphine/naloxone)
- buprenorphine tabs
- Sublocade injection
- Brixadi injection
- Vivitrol (naltrexone) injection
- naltrexone tabs
- acamprosate tabs
- disulfiram tabs
- Lucemyra (lofexidine)
- Narcan (naloxone)
- Opvee (nalmefene)
- Nicotrol (nicotine inhaler)
- Nicorette (nicotine gum)
- Chantix (varencline)
- Zyban (bupropion ER)

Mental Health Parity Related Findings

- **Buprenorphine lock out limitations**
 - 1st line for pregnant patients and naloxone allergies
- **Substance Use Disorder medications not considered maintenance**
 - Members can't get 90-day supplies at retail or mail order pharmacies
- **Quantity limits on buprenorphine/naloxone and buprenorphine**
 - Usually maximum of 3 tablets/films per day.
- **Narcan and naloxone product limitations**
 - No mail order delivery
 - “Acute Medication”
 - 2 Boxes per 180 Days
 - “Must try and fail alternatives”
 - Opvee (nalmefene)
 - Kloxxado



Narcan Provided Over the Counter



- Over the Counter (“OTC”)
- Prior to OTC medication, medication could be dispensed without a prescription or through a collaborative practice agreement (standing order from a physician)
- Who is seeking Narcan?
- OTC naloxone remains around \$35 to \$50 for twin pack.
- OTC availability in some instances has led to “no coverage for OTC items”
- Higher copays for states without tiering or cost share mandates

Mental Health Parity Related Findings



- **Spravato**
 - Risk Evaluation and Mitigation Strategy (“REMS”) Product
- **aripiprazole**
 - Prior Authorization
- **clonidine**
 - Prior Authorization
 - Off label – opioid withdrawal
- **Adderall and other ADHD medications**
 - Age Limitations – Prior Authorization
- **Zurzuvae**
 - Prior Authorization – Step Therapy
- **duloxetine**
 - Quantity Limits
- **Vyvanse**
 - Prior Authorization – Step Therapy



Prescription Drug Formulary Filing Reviews

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Objectives

- Formulary Filing Objectives
- Formulary Review Tips
- Mental Health Medications
- State Compliance Testing

Formulary Filing Objectives

- **Obtain list of RXCUIs**
 - Submitted by the Issuer
- **Run CMS Formulary Tools**
 - Formulary Review Suite
 - “All RXCUIs Submitted”
 - RXCUI List
- **Obtain list of medications that require review**
 - Establish a list of RXCUIs
- **Trends**
 - Prior Authorization
 - Tiering
 - Copays and Cost Share



Formulary Review Suite

RXCUI	Retired?	RxNorm Description	Chemically Distinct Drug	Brand Name (if Applicable)	Dose Form
351264	No	buprenorphine 2 MG Sublingual Tablet	buprenorphine		Sublingual Tablet
351265	No	buprenorphine 8 MG Sublingual Tablet	buprenorphine		Sublingual Tablet
351266	No	buprenorphine 2 MG / naloxone 0.5 MG Sublingual Tablet	buprenorphine; naloxone		Sublingual Tablet
351267	No	buprenorphine 8 MG / naloxone 2 MG Sublingual Tablet	buprenorphine; naloxone		Sublingual Tablet
1010600	No	buprenorphine 2 MG / naloxone 0.5 MG Sublingual Film	buprenorphine; naloxone		Sublingual Film
1010603	No	buprenorphine 2 MG / naloxone 0.5 MG Sublingual Film [Suboxone]	buprenorphine; naloxone	Suboxone	Sublingual Film
1010604	No	buprenorphine 8 MG / naloxone 2 MG Sublingual Film	buprenorphine; naloxone		Sublingual Film
1010606	No	buprenorphine 8 MG / naloxone 2 MG Sublingual Film [Suboxone]	buprenorphine; naloxone	Suboxone	Sublingual Film
1307056	No	buprenorphine 4 MG / naloxone 1 MG Sublingual Film	buprenorphine; naloxone		Sublingual Film
1307058	No	buprenorphine 4 MG / naloxone 1 MG Sublingual Film [Suboxone]	buprenorphine; naloxone	Suboxone	Sublingual Film
1307061	No	buprenorphine 12 MG / naloxone 3 MG Sublingual Film	buprenorphine; naloxone		Sublingual Film
1307063	No	buprenorphine 12 MG / naloxone 3 MG Sublingual Film [Suboxone]	buprenorphine; naloxone	Suboxone	Sublingual Film
1431083	No	buprenorphine 1.4 MG / naloxone 0.36 MG Sublingual Tablet [Zubsolv]	buprenorphine; naloxone	Zubsolv	Sublingual Tablet
1431104	No	buprenorphine 5.7 MG / naloxone 1.4 MG Sublingual Tablet [Zubsolv]	buprenorphine; naloxone	Zubsolv	Sublingual Tablet
1597570	No	buprenorphine 11.4 MG / naloxone 2.9 MG Sublingual Tablet [Zubsolv]	buprenorphine; naloxone	Zubsolv	Sublingual Tablet
1597575	No	buprenorphine 8.6 MG / naloxone 2.1 MG Sublingual Tablet [Zubsolv]	buprenorphine; naloxone	Zubsolv	Sublingual Tablet
1666385	No	buprenorphine 2.9 MG / naloxone 0.71 MG Sublingual Tablet [Zubsolv]	buprenorphine; naloxone	Zubsolv	Sublingual Tablet
1864414	No	buprenorphine 0.7 MG / naloxone 0.18 MG Sublingual Tablet [Zubsolv]	buprenorphine; naloxone	Zubsolv	Sublingual Tablet
1996189	No	0.5 ML buprenorphine 200 MG/ML Prefilled Syringe [Sublocade]	buprenorphine	Sublocade	Prefilled Syringe
1996193	No	1.5 ML buprenorphine 200 MG/ML Prefilled Syringe [Sublocade]	buprenorphine	Sublocade	Prefilled Syringe
2639027	No	0.16 ML buprenorphine 50 MG/ML Prefilled Syringe [Brixadi]	buprenorphine	Brixadi	Prefilled Syringe
2639030	No	0.32 ML buprenorphine 50 MG/ML Prefilled Syringe [Brixadi]	buprenorphine	Brixadi	Prefilled Syringe
2639032	No	0.48 ML buprenorphine 50 MG/ML Prefilled Syringe [Brixadi]	buprenorphine	Brixadi	Prefilled Syringe
2639034	No	0.64 ML buprenorphine 50 MG/ML Prefilled Syringe [Brixadi]	buprenorphine	Brixadi	Prefilled Syringe
2639039	No	0.18 ML buprenorphine 356 MG/ML Prefilled Syringe [Brixadi]	buprenorphine	Brixadi	Prefilled Syringe

Formulary Review Tips

- **Target areas of concern**
 - Nationwide initiatives
 - State initiatives
 - Complaints

- **New to market medications**
 - Consult with a clinician or pharmacist to stay up to date

- **Make a checklist**
 - Organization
 - Helps employees make it numerical rather than words they may not understand



Mental Health Medications

➤ Substance Use Disorder

▪ Opioid Use Disorder

- buprenorphine
 - Sublocade (inj)
 - Brixadi (inj)
- buprenorphine/naloxone
 - Zubsolv (tab)
 - Suboxone (film)
- lofexidene
 - Lucemyra

▪ Smoking Cessation

- Nicotrol
- Nicotrol NS
- Nicorette
- varenicline
 - Chantix
- bupropion ER

▪ Alcohol Dependence

- naltrexone
 - Vivitrol (inj)
- acamprosate
- disulfiram

▪ Opioid Reversal Agents

- naloxone (Rx)
 - Kloxxado
 - Zimhi
 - Narcan
 - Rextovy
 - Zimhi
 - Renzopy (August 2026)
- naloxone - nasal(OTC)
 - RiVive
 - Narcan
- Opvee (nalmefene)

Mental Health Medications

➤ Autistic Disorder (irritability)

- risperidone
- aripiprazole

➤ Treatment Resistant Depression

- Spravato

➤ Binge Eating Disorder

- Vyvanse (lisdexamfetamine)

➤ Post Partum Depression

- Zurzuvae

➤ Major Depressive Disorder

- Caplyta
- Pristiq (desvenlafaxine)
- Fetzima
- Viibryd (vilazodone)
- duloxetine

➤ Bipolar Disorder

- Vraylar
- Latuda (lurasidone)
- ziprasidone
- Caplyta

State Compliance

- Tiering of naloxone vs epinephrine
- Tiering of 1st line generic medications (preferred vs non-preferred)
- Coverage of medications that have a specific indication
- Formulary review suite does not see quantity limits or other amount of step therapy medications required.
- Consider requesting a published copy of the formulary prior to the use by a specific date
- Some states require state specific formulary web links
- Ongoing compliance checks during the year to review for published formularies
 - Secret Shopper

Questions?

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