### **Questions:**

The below questions apply to health plans as defined in 18 V.S.A. 9418(a)(8) (including third party administrators, to the extent permitted under federal law):

- 1. Has the health plan reviewed the list of medical procedures and medical tests for which it requires prior authorization (PA) at least once during the proceeding plan year and eliminated the PA requirements for procedures and tests for which such a requirement is no longer justified or for which requests are routinely approved with such frequency as to demonstrate that the PA requirement does not promote health care quality or reduce health care spending to a degree sufficient to justify the administrative costs to the plan?
  - a. What is the health plan's timeline for reviewing and eliminating prior authorization requirements? In answering this question, please provide the dates for the two most recent review cycles.

**MVP Response:** MVP continuously brings our clinical policies and data through our independent, physician run committee process. Below is a list of meeting dates, by MVP committee, where relevant PA policies and criteria were reviewed.

2023							
Medical Management Committee	Pharmacy & Therapeutics Committee	Clinical Operations Committee					
2/16/2023	1/19/2023	Q1: 1/23/2023					
3/16/2023	2/16/2023	Q2: 4/10/2023					
4/20/2023	3/16/2023	Q3: 7/10/2023					
5/18/2023	5/18/2023	Q4: 10/12/2023					
7/20/2023	6/15/2023						
8/17/2023	7/20/2023						
9/21/2023	9/21/2023						
11/16/2023	10/19/2023						
	12/7/2023						

b. Does the health plan ever add/eliminate PA requirements during a plan year (as opposed to between plan years)? Please explain.

**MVP Response:** MVP may add or eliminate PA requirements during a plan year. As previously stated, MVP does not just review the PA data once a year, so if a trend is identified, removal of PA requirements may occur at any time during the year.

c. What are the standards used by the health plan to evaluate PA requirements as outlined in 18 V.S.A. § 9418b(h) (including the thresholds the health plan considers in looking for routinely approved PAs, how the health plan determines whether PAs are promoting health care quality or reducing health care spending to a degree sufficient to justify the administrative costs to the plan)?

**MVP Response:** MVP considers multiple factors:

- Volume (those test & procedures with sufficient volume to reliably assess PA value)
- PA approval percentage (at least a 90% approval rate)
- Updates to standard of care and current literature supporting PA or removal
- Appeal and overturn rates
- Regulatory Requirements, drug safety, and quality of care are also weighed for removal of utilization management
- Delineation of impact of PA on health care spend to a degree sufficient to justify administrative costs to the plan (quantitative - plan ROI including review cost / excluding alternative care costs)

To the extent that the plan balances factors such as medical literature, quality, and cost (or others included in answer to Q1C), please explain the weight applied to each factor.

**MVP Response:** In general, equal weighting is applied to each factor, but weighting can vary depending on the specific type of treatment, procedure, or drug therapy. For example, in instances where there are clear clinical or quality standards that need to be followed, those are prioritized regardless of cost.

d. Does the health plan take into account the administrative burden of PAs on health care providers and patients and whether the administrative barriers to submit PAs may inhibit access to medically necessary care? Please explain.

**MVP Response:** MVP does evaluate the PA volume by provider and reviews utilization trends for certain services to ensure medically necessary care is being provided. MVP also does receive feedback from our participating providers and has modified and/or removed PA on specific services based upon their feedback.

Explain how provider administrative burden is weighted against other factors when deciding whether to apply a PA to a given service. What assumptions does the plan make with respect to the administrative burden associated with a PA requirement in terms of provider/patient time spent submitting the request, cost to providers (administrative staff, time spent on paperwork instead of with patients), member impact (potential second visit, adverse medical consequences as result of deferred/delayed care).

**MVP Response:** Improving member experience and meeting their healthcare needs are central to MVP's core values. The organization strives to reduce unnecessary administrative burden on providers, and any resultant friction it may cause for members' experience. When

implementing a PA program, MVP seeks the minimum necessary information to meet the clinical standards of care or quality recommendations.

Importantly, any PA requirements also add costs and burden for MVP. These programs require additional policy development, systems configuration, IT investments, and additional staffing to support the numerous phone calls, provider and member communications, and internal/external appeals. State and federal medical loss ratio (MLR) requirements effectively cap what MVP can spend on non-medical, administrative costs—including those described here.

To attract and retain members, MVP must keep its administrative costs as low as possible to offer the most competitively priced products. Similarly, member experience also drives consumer decisions on whether to stay with MVP, or to switch health plans. So, it's not in MVP's interest to incur unnecessary administrative costs or establish burdens and barriers that diminish member or provider experience. When MVP implements a PA requirement, there are very clear and obvious quality, efficacy, and cost related reasons for doing so.

MVP is also constantly exploring new innovations and investments that can reduce this administrative burden for all parties. Online provider portals, electronic health record systems, and automation provide endless opportunities to ease the manual paperwork, phone calls, and any other associated administrative costs.

Lastly, alternative provider payment models provide opportunities that benefit providers, members, and health plans alike. MVP is actively working with its provider network partners to establish new capabilities and advance models that empower and incentivize providers in different ways. Ultimately, these models can delegate more clinical autonomy to provider partners by establishing a shared commitment around costs, quality, and efficacy of member treatment.

2. What medical procedures and tests had PA requirements eliminated or added during the preceding plan year and what was the rationale for changing those requirements?

**MVP Response:** MVP Added prior authorization to Medical Oncology drugs as of January 1<sup>st</sup>, 2024. The full List of codes is available upon request. Additionally, the chart below represent all Medical and Pharmacy Prior auth changes as of January 1<sup>st</sup>, 2023.

CPT Code	Service (Procedure)	Change	Prior Auth	Reason	Effec. Date	LOB
E0316	Safety enclosure frame/canopy	Add	Prior Auth	Add back to PA	1/1/2023	All
L2006	Knee ankle foot device	Add	Prior Auth	Investigational	1/1/2023	All
E1801	Dynamic Brace	Removed	Prior Auth	Removed from Review	1/31/2023	All
E1806	Dynamic Brace	Removed	Prior Auth	Removed from Review	1/31/2023	All
E1811	Dynamic Brace	Removed	Prior Auth	Removed from Review	1/31/2023	All
E1818	Dynamic Brace	Removed	Prior Auth	Removed from Review	1/31/2023	All
69705	Nasopharyngoscopy	Add	Prior Auth	Investigational	2/1/2023	All
69706	Nasopharyngoscopy	Add	Prior Auth	Investigational	2/1/2023	All
K1018	External upper limb tremor stimulator of the peripheral nerves of the wrist	Add	Prior Auth	Investigational	2/1/2023	All
K1019	Monthly supplies for use of device coded at k1018	Add	Prior Auth	Investigational	2/1/2023	All
19342	Breast Reconstruction	Removed	Prior Auth	Removed from Review	3/31/2023	All

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Breast Reconstruction	Removed	Prior Auth	Removed from Review	3/31/2023	All
Implantable Cardioverter Defibrillator	Removed	Prior Auth	Removed from Review	3/31/2023	All
Implantable Cardioverter Defibrillator	Removed	Prior Auth	Removed from Review	3/31/2023	All
Implantable Cardioverter Defibrillator	Removed	Prior Auth	Removed from Review	3/31/2023	All
Implantable Cardioverter Defibrillator	Removed	Prior Auth	Removed from Review	3/31/2023	All
Implantable Cardioverter Defibrillator	Removed	Prior Auth	Removed from Review	3/31/2023	All
Implantable Cardioverter Defibrillator	Removed	Prior Auth	Removed from Review	3/31/2023	All
Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
Endovascular AAA repair	Removed			3/31/2023	All
Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
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Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
Bariatric Surgery	Removed	Prior Auth	Removed from Review	3/31/2023	All
Bariatric Surgery	Removed	Prior Auth	Removed from Review	3/31/2023	All
Bariatric Surgery	Removed	Prior Auth	Removed from Review	3/31/2023	All
	Defibrillator  Implantable Cardioverter Defibrillator  Endovascular AAA repair  Endovascular AAA repair	Defibrillator  Implantable Cardioverter Defibrillator  Implantable Cardioverter Removed Defibrillator  Implantable Cardioverter Defibrillator  Implantable Cardioverter Removed Defibrillator  Implantable Cardioverter Defibrillator  Implantable Cardioverter Removed Defibrillator  Implantable Cardioverter Removed Defibrillator  Endovascular AAA repair Removed Removed	Defibrillator   Implantable Cardioverter Defibrillator   Removed   Prior Auth Defibrillator   Removed   Prior Auth Defibrillator   Endovascular AAA repair   Removed   Prior Auth   Endovasc	Defibrillator   Implantable Cardioverter Defibrillator   Prior Auth Removed from Review Defibrillator   Implantable Cardioverter Defibrillator   Prior Auth Removed from Review Defibrillator   Implantable Cardioverter Defibrillator   Prior Auth Removed from Review Defibrillator   Implantable Cardioverter Defibrillator   Prior Auth Removed from Review Defibrillator   Implantable Cardioverter Defibrillator   Prior Auth Removed from Review Endovascular AAA repair Removed Prior Auth Rem	Defibrillator   Implantable Cardioverter   Defibrillator   Prior Auth   Removed from Review   3/31/2023   3/31/2023   Prior Auth   Removed from Review   3/31/2023   Bariatric Surgery   Removed   Prior Auth   Removed from Review   3/31/2023   Bariatric Surgery   Removed   Prior Auth   Removed from Review   3/31/2023   Bariatric Surgery   Removed   Prior Auth   Removed from Review   3/31/2023   Pri

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	Prior Authorization Attes	<u>tation Form</u>	(2024)	1	_	
61863	Deep Brain Stimulation	Removed	Prior Auth	Removed from Review	3/31/2023	All
61864	Deep Brain Stimulation	Removed	Prior Auth	Removed from Review	3/31/2023	All
61867	Deep Brain Stimulation	Removed	Prior Auth	Removed from Review	3/31/2023	All
61868	Deep Brain Stimulation	Removed	Prior Auth	Removed from Review	3/31/2023	All
61880	Deep Brain Stimulation	Removed	Prior Auth	Removed from Review	3/31/2023	All
63663	Deep Brain Stimulation	Removed	Prior Auth	Removed from Review	3/31/2023	All
64581	Sacral Nerve Stimulator	Removed	Prior Auth	Removed from Review	3/31/2023	All
64590	Sacral Nerve Stimulator	Removed	Prior Auth	Removed from Review	3/31/2023	All
75956	Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
75957	Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
75958	Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
75959	Endovascular AAA repair	Removed	Prior Auth	Removed from Review	3/31/2023	All
95805	Sleep Study	Removed	Prior Auth	Removed from Review	3/31/2023	All
95961	Deep Brain Stimulation	Removed	Prior Auth	Removed from Review	3/31/2023	All
95962	Deep Brain Stimulation	Removed	Prior Auth	Removed from Review	3/31/2023	All
D7880	Oral Appliance for Sleep	Removed	Prior Auth	Removed from Review	3/31/2023	All
L7368	Cochlear Implant	Removed	Prior Auth	Removed from Review	3/31/2023	All
L8040	Nasal Prosthesis	Removed	Prior Auth	Removed from Review	3/31/2023	All
L8041	Midfacial Prosthesis	Removed	Prior Auth	Removed from Review	3/31/2023	All
L8042	Orbital Prosthesis	Removed	Prior Auth	Removed from Review	3/31/2023	All
L8043	Upper Facial Prosthesis	Removed	Prior Auth	Removed from Review	3/31/2023	All
L8044	Hemi-facial Prosthesis	Removed	Prior Auth	Removed from Review	03/21/2023	All
L8045	Auricular Prosthesis	Removed	Prior Auth	Removed from Review	03/31/2024	All
L8047	Nasal Septal Prosthesis	Removed	Prior Auth	Removed from Review	3/31/2023	All
L8048	Unspecified maxillofacial	Removed	Prior Auth	Removed from Review	03/31/2024	All
L8049	Repair or modification, maxillofacial prosthesis	Removed	Prior Auth	Removed from Review	3/31/2023	All
S1040	Cranial Orthosis	Removed	Prior Auth	Removed from Review	3/31/2023	All
A4575	Topical hyperbaric oxygen chamber	Correction	Prior Auth	Add back to PA	4/1/2023	All
E0677	Non-pneumatic sequential compression garment	Add	Prior Auth	Investigational	4/1/2023	All
E1905	Virtual reality cognitive behavioral therapy device	Add	Prior Auth	Investigational	04/01/2023	All
95925	Intraoperative Neuro Monitoring	Removed	Prior Auth	Removed from Review	5/31/2023	All
95926	Intraoperative Neuro Monitoring	Removed	Prior Auth	Removed from Review	5/31/2023	All
95927	Intraoperative Neuro Monitoring	Removed	Prior Auth	Removed from Review	5/31/2023	All
95940	Intraoperative Neuro Monitoring	Removed	Prior Auth	Removed from Review	5/31/2023	All
95941	Intraoperative Neuro Monitoring	Removed	Prior Auth	Removed from Review	5/31/2023	All
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	Prior Authorization Attest			b 16 b :	05 /21 /2022	-lau
G0330	Outpatient Facility Fee for Dental	Removed		Removed from Review	05/31/2023	All
A9292	Prescription digital visual therapy	Add	Prior Auth	Investigational	10/01/2026	All
E0490	Power source and control electronics unit	Add	Prior Auth	Investigational	10/01/2023	All
E0491	Oral device/appliance for neuromuscular electrical	Add	Prior Auth	Investigational	10/01/2023	All
L5991	Addition to lower extremity prostheses	Add	Prior Auth	Investigational	10/1/2023	All
A9291	Prescription digital cognitive and/or behavioral therapy	Add	Prior Auth	Investigational	12/1/2023	All
K1028	Power source and control electronics unit	Add	Prior Auth	Investigational	12/1/2023	All
K1029	Oral device/appliance for neuromuscular electrical	Add	Prior Auth	Investigational	12/1/2023	All
	SKYSONA	Added Medical PA	Prior Auth	Moved to Covered	1/1/2023	Commercial, ASO, EXCH
	ZYNTEGLO	Added Medical PA	Prior Auth	Moved to Covered	1/1/2023	Commercial, ASO, EXCH
	TASIMELTEON	Added RX PA	Prior Auth	Moved to Covered	1/6/2023	Commercial, ASO, EXCH
	PIRFENIDONE	Added RX PA	Prior Auth	Moved to Covered	1/13/2023	Commercial, ASO, EXCH
	TZIELD	Added Medical PA	Prior Auth	Moved to Covered	1/19/2023	Commercial, ASO, EXCH
	ZTALMY	Added RX PA	Prior Auth	Moved to Covered	1/19/2023	Commercial, ASO, EXCH
	PLUVICTO	Added Medical PA	Prior Auth	Moved to Covered	2/6/2023	Commercial, ASO, EXCH
	QUVIVIQ	Termed RX PA (Added	Prior Auth	Moved to Covered	2/23/2023	Commercial, ASO, EXCH
	DEXCOM RECEIVER	Added PA (CGM) - NDC	Prior Auth	Moved to Covered	4/1/2023	Commercial, ASO, EXCH
	DEXCOM SENSOR	Added PA (CGM) - NDC	Prior Auth	Moved to Covered	4/1/2023	Commercial, ASO, EXCH
	DEXCOM TRANMITTER	Added PA (CGM) - NDC	Prior Auth	Moved to Covered	4/1/2023	Commercial, ASO, EXCH
	KYZATREX	Added RX PA		Moved to Covered	5/18/2023	Commercial, ASO, EXCH
	PHEBURANE	Added RX PA	Prior Auth	Moved to Covered	5/18/2023	Commercial, ASO, EXCH
	SPEVIGO	Added	Prior Auth	Moved to Covered	5/18/2023	Commercial, ASO, EXCH
	TADLIQ	Added RX PA	Prior Auth	Moved to Covered	5/18/2023	Commercial, ASO, EXCH
	XENPOZYME	Added Medical PA	Prior Auth	Moved to Covered	5/18/2023	Commercial, ASO, EXCH
	RELYVRIO	Added RX PA	Prior Auth	Moved to Covered	6/15/2023	Commercial, ASO, EXCH
	VOWST	Added RX PA	Prior Auth	Moved to Covered	6/15/2023	Commercial, ASO, EXCH
	PRALATREXATE	Added Medical PA	Prior Auth	Moved to Covered	8/4/2023	Commercial, ASO, EXCH
	BRIUMVI	Added Medical PA	Prior Auth	Moved to Covered	9/21/2023	Commercial, ASO, EXCH
	LEQEMBI	Added	Prior Auth	Moved to Covered	9/21/2023	Commercial, ASO, EXCH
	REBYOTA	Added Medical PA	Prior Auth	Moved to Covered	9/27/2023	Commercial, ASO, EXCH
	SYFOVRE	Added Medical PA	Prior Auth	Moved to Covered	10/1/2023	Commercial, ASO, EXCH
	FIRST PANTOPRAZOLE SUSPENSION	> 7 years	Prior Auth	Moved to Covered	10/13/203	Commercial, ASO, EXCH
	CUVRIOR		Prior Auth	Moved to Covered	10/19/2023	Commercial, ASO, EXCH
	DAYBUE	Added RX PA	Prior Auth	Moved to Covered	10/19/2023	Commercial, ASO, EXCH

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	JOENJA	Added RX PA Prior	Auth Moved to Covered	10/19/2023	Commercial, ASO, EXCH
	LAMZEDE	Added Prior Medical PA	Auth Moved to Covered	10/19/2023	Commercial, ASO, EXCH
	SKYCLARYS	Added RX PA Prior	Auth Moved to Covered	10/19/2023	Commercial, ASO, EXCH
	MOUNJARO	Added Smart Prior PA	Auth Moved to Covered	11/1/2023	Commercial, ASO, EXCH
	OZEMPIC	Added Smart Prior PA	Auth Moved to Covered	11/1/2023	Commercial, ASO, EXCH
	RYBELSUS	Added Smart Prior PA	Auth Moved to Covered	11/1/2023	Commercial, ASO, EXCH
	TRULICITY	Added Smart Prior PA	Auth Moved to Covered	11/1/2023	Commercial, ASO, EXCH
	VICTOZA	Added Smart Prior PA	Auth Moved to Covered	11/1/2023	Commercial, ASO, EXCH

3. What are the ten most requested PAs for **both** medical PAs and prescription drug PAs (20 total) during the preceding plan year? For each of the 20 PAs, please provide the number of PAs requested and approval rate for each PA (PAs in this list may overlap with eliminated PAs identified in question 2).

**MVP Response:** 

The ten (10) most requested PAs for medical services are as follows:

Procedure Code and Description	Approve d	% Approved	Denie d	% Denied	Total Auths
74177:CT scan of abdomen and pelvis	412	96.04%	17	3.96%	429
73721:MRI of a leg joint	393	94.47%	23	5.53%	416
70553:MRI of the brain	369	97.11%	11	2.89%	380
71271:CT scan of chest	355	97.26%	10	2.74%	365
72148:MRI, inner spine (canal)	260	87.25%	38	12.75%	298
71260:CT scan of chest	270	93.75%	18	6.25%	288
73221:MRI of an arm joint	225	91.84%	20	8.16%	245
95810:Overnight sleep study	227	94.19%	14	5.81%	241
A4239:Non-adju cgm supply allow	136	80.95%	32	19.05%	168
95811:Overnight sleep study	147	96.08%	6	3.92%	153

The ten (10) most requested PAs for pharmacy services are as follows:

		%		%	Total
Product Name	<b>Approved</b>	<b>Approved</b>	Denied	Denied	Auths
OZEMPIC	96	53.93%	82	46.07%	178
TADALAFIL	19	23.75%	61	76.25%	80
MOUNJARO	28	35.44%	51	64.56%	79
DUPIXENT	60	84.51%	11	15.49%	71
WEGOVY	29	44.62%	36	55.38%	65
TRULICITY	43	78.18%	12	21.82%	55
HUMIRA PEN	50	96.15%	2	3.85%	52
PRALUENT	34	80.95%	8	19.05%	42
FLUTICASONE PROPIONATE	1	3.23%	30	96.77%	31
LIDOCAINE	2	6.90%	27	93.10%	29

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4. What percentage of urgent and non-urgent PA requests are granted because processing time exceeded the statutory timeframes established under 18 V.S.A. § 9418 b(q)(4)?

**MVP Response:** 3.5%

Is that number combining urgent and non-urgent categories? If possible, please submit this information broken out by urgent and non-urgent percentages.

## **MVP Response:**

Urgent: 7.0% Non-urgent: 3.3%