

PrEP Financing and Payment

JSI Research & Training Institute (JSI)

Center for Health Law and Policy Innovation, Harvard Law School

AccessHealth MA

2023 PrEP Webinar Series: Oral and Injectable PrEP

Session 2: Monday, May 8, 2023 | 3PM - 4PM ET



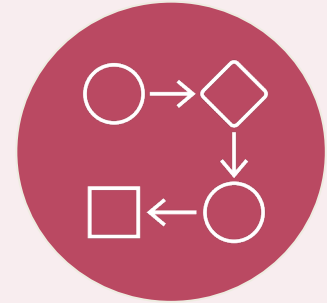
Learning Objectives



Describe the current PrEP coverage, billing, and reimbursement policies for public and private insurers in Massachusetts.



Apply strategies to support PrEP access and adherence for both insured and uninsured clients.



Identify the key PrEP financing and payment components that should be incorporated into HIV prevention program workflows.

Presenters



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Today's Agenda

1

Recap of Session 1

2

PrEP Coverage,
Billing, and
Reimbursement

3

PrEPDAP and
Other Strategies
to Address
Financial Barriers

4

Q&A





1

Recap of Session
1: Understanding
Injectable and Oral
PrEP

Currently available options for PrEP include: **oral TDF/FTC (Truvada)**, **oral TAF/FTC (Descovy)**, and **injectable cabotegravir (Apretude)**.

All forms of PrEP are highly effective
when taken as prescribed, and
generally well-tolerated.

On-demand PrEP with TDF/FTC is an alternative dosing strategy studied among MSM.

Same-day PrEP initiation may improve access and uptake and is **most feasible with oral PrEP.**

Consider **preferences, comorbidities,**
the nature of an individual's HIV
exposure, and **logistics** when working
with a patient/client to select a PrEP
option.



Polls



2

PrEP Coverage, Billing, and Reimbursement



PrEP Coverage, Billing, and Reimbursement



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Key Preventive Health Care Services

Contains
recommendations
related to PrEP!



1 USPSTF “A” and “B”
recommendations

2 Immunizations as recommended by ACIP

3 Preventive care and screenings recommended by HRSA for infants,
children, and adolescents

4 Preventive care and screenings recommended by HRSA for women

Braidwood Management v. Becerra

Employers and individuals filed a federal lawsuit in Texas challenging the ACA requirement that private insurance fully cover key preventive services.

The court vacated agency action interpreting law requiring private insurance to cover USPSTF-recommended preventive care at no additional cost.



The government has asked the court to stay the ruling and is appealing the decision.

- ✗ USPSTF “A” and “B” recommendations
- ✓ Immunizations as recommended by ACIP
- ✓ Preventive care and screenings recommended by HRSA for infants, children, and adolescents
- ✓ Preventive care and screenings recommended by HRSA for women

What does this mean for folks now?

We do not expect changes in 2023. (*Let us know if you see any!*)

The ultimate impact is uncertain.

1. USPSTF “A” and “B” recommendations
2. Immunizations as recommended by ACIP
-  3. Preventive care and screenings recommended by HRSA for infants, children, and adolescents
-  4. Preventive care and screenings recommended by HRSA for women

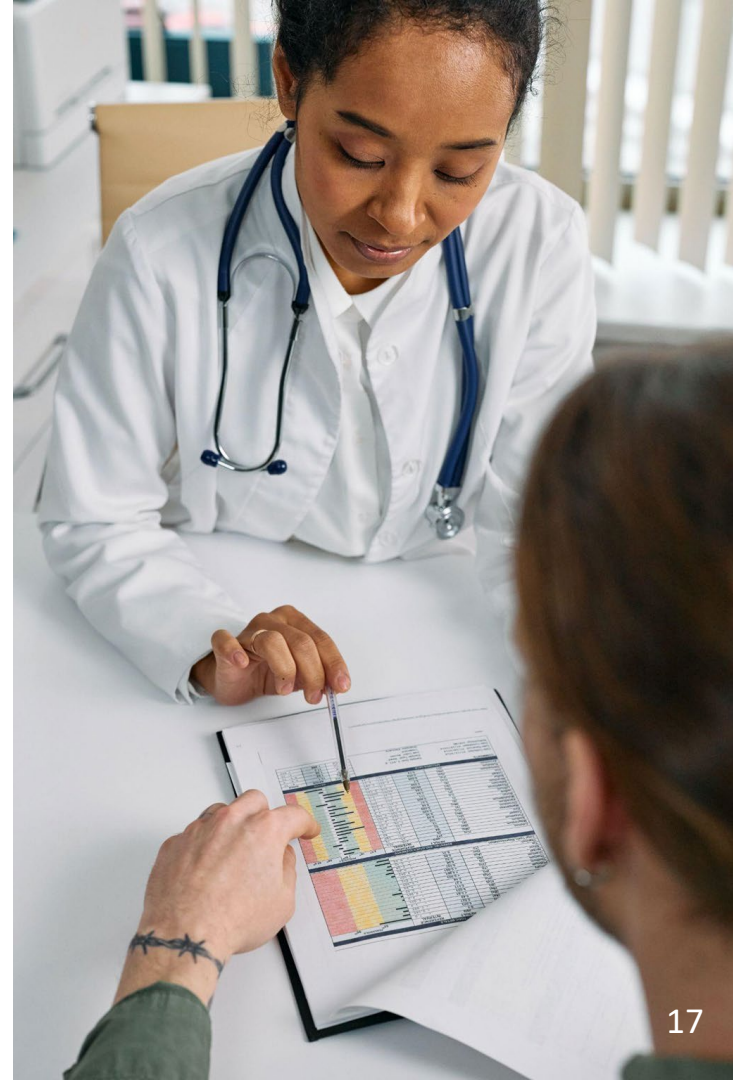
Current PrEP Landscape

Qualified Health Plans

MassHealth

Billing Considerations

“Red Flags”



Qualified Health Plans on the Connector

| | TDF/FTC | Truvada | Descovy | Apretude |
|---------------------------|-----------------|---------------------|---------------------|-------------|
| BCBSMA | <u>Tier 1</u> | Tier 2/3 | Tier 2 | Tier 2 |
| Fallon Health | <u>Tier 1</u> | <u>Tier 3 (PA)*</u> | <u>Tier 3*</u> | X |
| Harvard Pilgrim | <u>Tier 2/3</u> | <u>X*</u> | <u>Tier 2/3*</u> | X |
| Health New England | Tier 1 | X | Tier 2 (PA) | X |
| MGB Health Plan | Tier 1 | X | Tier 2 | (PA) |
| Tufts Health Plan | <u>Tier 2*</u> | X | <u>Tier 2 (PA)*</u> | X |
| UnitedHealthcare | <u>Tier 1</u> | Tier 3/X | X (PA) | X |
| WellSense | <u>Tier 1/2</u> | X | Tier 2 (PA) | Tier 3 (PA) |

Underline: Mention of \$0 copay

*: PA for PrEP use
(PA): PA for general use

¹: tiering adjusted for standardization

MassHealth Considerations

- TDF/FTC (Truvada): Prior Authorization (PA) needed for Brand
- TAF/FTC (Descovy): Preferred Drug
- Cabotegravir injection (Apretude): subject to PA (as of 4/1/23)

Section VII. Please complete for Apretude requests.

1. Please provide member's current weight. _____
2. Is the member HIV-negative? Yes No
3. Is the member considered at risk for acquiring HIV infection? Yes No
4. Please provide clinical rationale for use instead of emtricitabine/tenofovir disoproxil fumarate.

5. Please provide clinical rationale for use instead of Descovy.

** Please attach a letter documenting additional trials as necessary.*

Billing

- Baseline and monitoring services should be covered too!
 - HIV testing; Hepatitis B and C testing
 - Creatinine testing and calculated estimated creatinine clearance (eCrCl) or glomerular filtration rate (eGFR)
 - Pregnancy testing
 - Sexually transmitted infection (STI) screening and counseling
 - Adherence counseling
- Modifier 33 is appended to CPT/HCPCS codes connected to USPSTF A and B recommendations.

Billing: Insurer- Specific

HIV PrEP:

Ongoing follow-up and monitoring

This includes:

- HIV testing
- Hepatitis B and C testing
- Creatinine testing and calculated estimated creatinine clearance (eCrCl) or glomerular filtration rate (eGFR)
- Pregnancy testing
- Sexually transmitted infection (STI) screening and counseling
- Adherence counseling
- Office visits

CPT code(s) billed with the below ICD-10 code(s):

82565 - Creatinine; blood

82570 - Creatinine; other source

82575 - Creatinine; clearance

82610 - Cystatin C

84702 - Gonadotropin, chorionic (hCG); quantitative

84703 - Gonadotropin, chorionic (hCG); qualitative

81025 - Urine pregnancy test, by visual color comparison method

87389 - Infectious agent antigen detection by immunoassay technique, (eg, enzyme immunoassay [EIA], enzyme-linked immunosorbent assay [ELISA], fluorescence immunoassay [FIA], immunochemiluminometric assay [IMCA]) qualitative or semiquantitative; HIV-1 antigen(s), with HIV-1 and HIV-2 antibodies, single result

87534 - Infectious agent detection by nucleic acid (DNA or RNA); HIV-1, direct probe technique

87535 - Infectious agent detection by nucleic acid (DNA or RNA); HIV-1, amplified probe technique, includes reverse transcription when performed

87536 - Infectious agent detection by nucleic acid (DNA or RNA); HIV-1, quantification, includes reverse transcription when performed

87537 - Infectious agent detection by nucleic acid (DNA or RNA); HIV-2, direct probe technique

87538 - Infectious agent detection by nucleic acid (DNA or RNA); HIV-2, amplified probe technique, includes reverse transcription when performed

87539 - Infectious agent detection by nucleic acid (DNA or RNA); HIV-2, quantification, includes reverse transcription when performed

ICD-10 code(s):

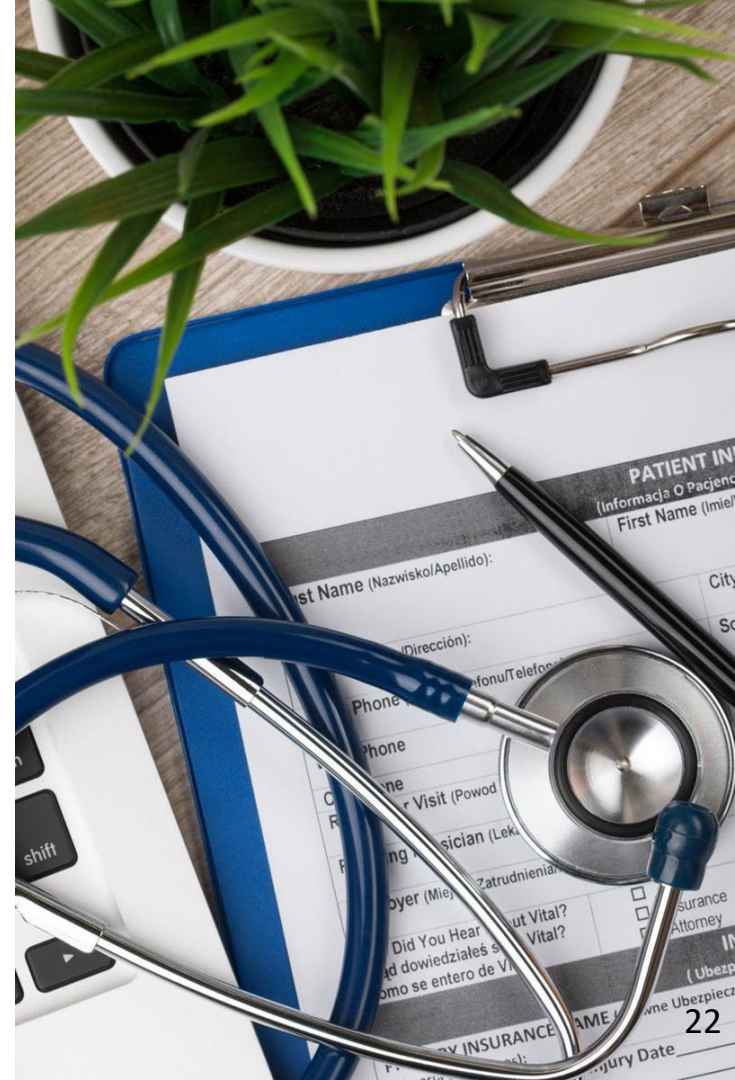
Z11.4 - Encounter for screening for human immunodeficiency virus [HIV]

Z20.6 - Contact with and (suspected) exposure to human immunodeficiency virus [HIV]

B20 - Human immunodeficiency virus [HIV] disease

Red Flags

- Cost-sharing for PrEP or ancillary services
- Burdensome medical management techniques
- **Helpful information:**
 - Insurer
 - Type of Insurance
 - Type of PrEP
 - Prior Approval Justification
 - Timeline



Looking Ahead

- CHLPI is developing a resource for providers regarding the Massachusetts PrEP Landscape.
- There are state legislative efforts underway to address *Braidwood Management* uncertainty and utilization management of PrEP.

Stay tuned!



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3

PrEPDAP and Other Strategies to Address Financial Barriers

PrEP



AccessHealth MA

AccessHealth MA: Who We Are



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PrEPDAP/nPEP
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Massachusetts PrEPDAP

A state funded program that provides assistance to eligible Massachusetts residents who are uninsured, or who are underinsured (i.e. have copays or deductibles associated with insurance).

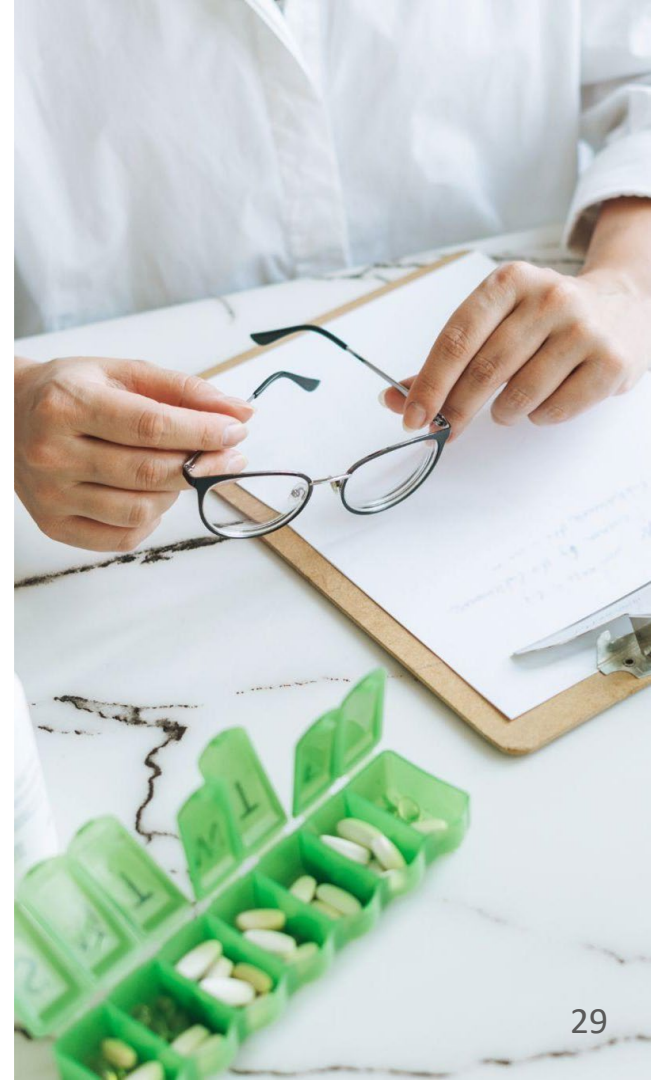
One of only fourteen state-funded PrEP drug assistance programs across the country & one of only six programs that assists enrollees with both co-pays and the full cost of medication.



Massachusetts PrEPDAP

Administered by AccessHealth MA (formerly CRI) as part of the MA Infectious Disease Drug Assistance Program (IDDAP) through a contract with the Massachusetts Department of Public Health.

Ensures that low to moderate income state residents at risk of HIV infection are able to access PrEP (oral and/or injectable) without any barriers.



Massachusetts PrEPDAP

Provides client-centered enrollment support, as well as insurance navigation for individuals who are uninsured.

Also does extensive statewide training for providers and consumers around access to PrEP.

Originally began in 2016 as a MDPH pilot and has since assisted over 1,700 unduplicated clients in accessing PrEP.





Polls

Eligibility Determination & Enrollment Process



Any MA resident who is HIV negative & has an income $\leq 500\%$ FPL (with an allowance for each dependent)*



Will cover out of pocket costs (copays or deductibles) for insured clients



Will cover 2 months of full cost of PrEP for uninsured clients, or clients with confidentiality concerns around using their insurance



Client must approve a pharmacy to ensure pharmacy will accept payment from a third party



Must recertify once a year

*If someone is just over income, but at a high risk of HIV acquisition, exceptions can be made to program income eligibility

PrEPDAP's Uninsured Policy

- Due to limited state funding for the program, and the importance of access to comprehensive medical care for clients on PrEP, PrEPDAP only covers uninsured individuals for **two (2) months at full cost**
- However, PrEPDAP will provide **insurance navigation assistance** at the same time as PrEPDAP enrollment is approved for an uninsured client
- Once a client is insured, PrEPDAP can assist with **out-of-pocket costs**, but cannot pay insurance premiums (as HDAP, the HIV Drug Assistance Program, does)
- In addition, there are other programs such as [Ready, Set, PrEP](#) and drug company patient assistance programs that clients can access if they do not want to enroll in coverage



PrEPDAP

Pre-Exposure Prophylaxis Drug Assistance Program

| | |
|------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| PEOPLE SERVED | PrEPDAP is for people at risk for HIV |
| FUNDING | PrEPDAP is funded by the Massachusetts Department of Public Health |
| INSURANCE | PrEPDAP can pay for deductibles but not premiums |
| COVERAGE | PrEPDAP can pay for out-of-pocket costs, including copays & full cost payments towards a deductible, for medications used as PrEP only |
| COVERAGE TERM | PrEPDAP coverage is for a 12-month term |
| CLINICIAN SIGNATURE | A clinician's signature is not required to process a PrEPDAP application |
| PAYER OF LAST RESORT | PrEPDAP clients do not need to apply to MassHealth to access PrEPDAP |
| PHARMACY | PrEPDAP has a limited pharmacy network |
| APPLICATION TURNAROUND | Completed PrEPDAP applications are approved in 0-2 business days |



All MA residents are eligible regardless of immigration status



Income limit: 500% FPL

Financing Issues Related to Switching from Oral to Injectable PrEP

- Because Apretude (LAI PrEP) has to be administered in a clinician's office, there may be additional office visit costs to be considered when switching from oral to injectable PrEP
- In addition, some insurers may require the submission of a Prior Authorization (PA) form to have injectable PrEP covered
- ViiV also has the Apretude Savings Program ([ViiV Connect](#))
- PrEPDAP can help navigate these issues and ensure there are no gaps in PrEP utilization for clients
- PrEPDAP covers out-of-pocket pharmacy costs for Apretude for eligible clients (does not include medical or clinical costs)



Other: nPEP

Part of the biomedical prevention program of IDDP is also the nPEP program, which can reimburse pharmacies for nPEP costs for uninsured and underinsured individuals.

Clinical sites must enroll and designate a pharmacy

Consider seamless transition to PrEP for individuals who remain at risk for HIV

[MA nPEP: accesshealthma.org/prevention/pep](https://accesshealthma.org/prevention/pep)



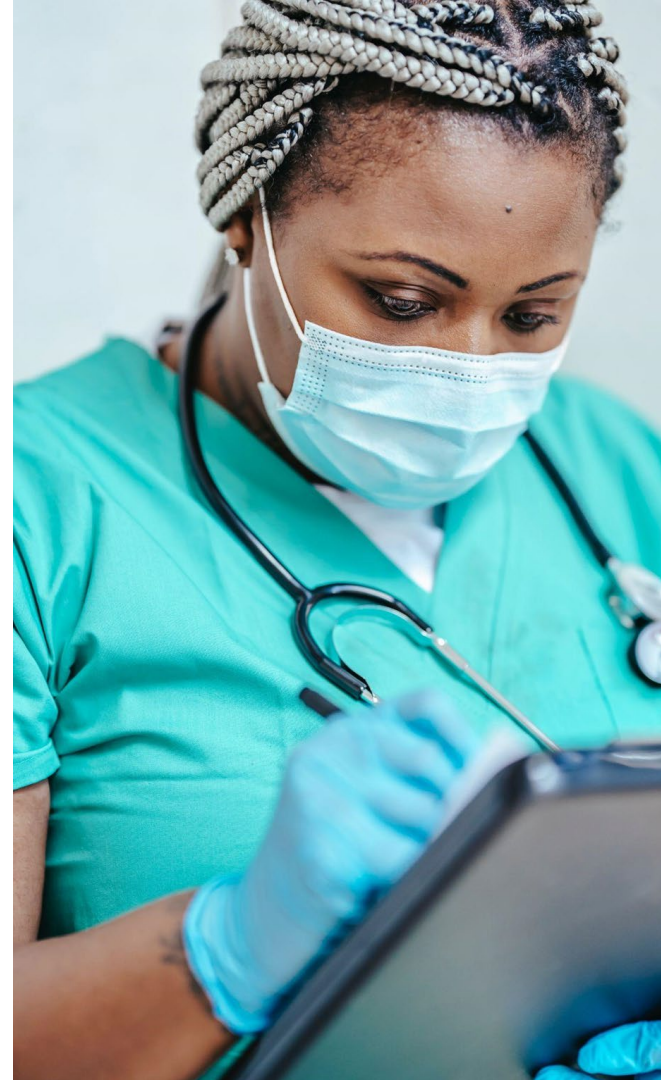
Other: Training

PrEPDAP staff also provide training to Case Workers and PrEP Navigators who support clients

Works with pharmacies on training staff on PrEPDAP and nPEP billing procedures and the reimbursement for eligible clients to avoid out-of-pocket costs

Statewide education and training on the PrEPDAP and nPEP application processes and provide information on the approved PrEP and PEP medications

Works with NEAETC (New England AIDS Education & Training Center) on identifying training needs



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Apply for PrEPDAP or nPEP

PrEPDAP application: [PrEPDAP-May-2022-Application Fillable.pdf](#)
[\(accesshealthma.org\)](#)

nPEP application: [APPLICATION AND PHARMACY REIMBURSEMENT FORM](#)
[\(accesshealthma.org\)](#)



4

Q&A

Looking Ahead

Session 3: PrEP Decision-Making: Client and Provider Communication

Monday, June 5 from 3PM - 4:30PM ET

Session 4: Integrating PrEP Into Clinical, Non-Clinical, and Inter-agency Workflows

Monday, June 26 from 3PM - 4PM ET



Thank you!

Please take a moment to complete the brief feedback form!

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