



## SCHOOL EMPLOYEES RETIREMENT SYSTEM OF OHIO

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LISA J. MORRIS  
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March 11, 2014

The Honorable Lynn Wachtmann  
Ohio House of Representatives  
77 S. High St., 13th Floor  
Columbus, OH 43215-6111

Dear Chairman Wachtmann:

At the last Ohio Retirement Study Council meeting, you had asked for information from each of the systems about the safeguards in place regarding opioid safety and management in our retiree drug program. SERS has the following programs in place through our pharmacy benefit manager, Express Scripts (ESI).

### **Fraud, Waste & Abuse**

Fraud, Waste & Abuse (FWA) is an investigative service program that helps identify potential problem prescribers and members with unusual or excessive utilization patterns. The program helps identify outliers and situations of abnormal utilization or prescribing patterns by analyzing types of prescriptions, refill patterns, and pharmacy utilization. Investigations are performed on aberrant behavior, such as doctor-shopping, drug-seeking behavior, identity theft etc. This program identifies instances where action can be taken to encourage appropriate use and safety, and reduce costs.

The program utilizes analysis, investigation, reporting, and consultation to provide the information needed to manage FWA. Components include:

- Identifying concerns using advanced analytics and data modeling
- Completing full case investigations into allegations, and
- Providing written investigative reports when potential fraud or abuse is identified

The investigative reports include relevant evidence and prescription claims history. Consultation calls with the ESI Program Integrity team are available with critical case findings.

### **Case Management for Opioid Overutilization for Medicare Members**

Medicare published guidance in both the Final CY 2013 Call Letter issued on April 2, 2012, and a memo dated September 6, 2012. Part D plan sponsors are expected to implement case management for the improvement of controls on opioid over-utilization.

ESI implemented a clinical case management program that went into effect on April 1, 2013. The case management program identifies potential opioid over-utilizers based on CMS targeting criteria (beneficiaries who have exceeded 120 mg Morphine Equivalent Dose [MED] for at least 90 consecutive days AND visited four or more prescribers AND four or more pharmacies). The program includes written and verbal communication with the prescribers, and as well as written communication to the patient regarding a potential point-of-sale prior-approval restriction as a result of the case management review.

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## Drug Quantity Limits

Express Scripts monitors the quantity of opioid medications on hand for each member prior to allowing the purchase of additional opioids. This prevents refills from occurring before the patient has used a significant quantity of the previous dose, in accordance with the individual physician's instructions for use. This in turn prevents a member from accumulating a stockpile of medicine.

Thank you for the opportunity to provide information concerning opioid use monitoring and potential abuse through our pharmacy benefit manager. If we can assist you with additional information, please don't hesitate to contact us at any time.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lisa J. Morris".

Lisa J. Morris  
**Executive Director**

CC: Bethany Rhodes, ORSC