

MO HealthNet has received several questions regarding Bulletin 46-03, “Automatic Refill Program.” In order to address these questions, MO HealthNet created the following FAQs; MO HealthNet will update the FAQ as necessary. If you have additional questions regarding the Automatic Refill Program Policy, contact the MO HealthNet Pharmacy Administration Unit at MHD.PharmacyAdmin@dss.mo.gov.

Why is MO HealthNet implementing a ban on automatic refill programs?

MO HealthNet based the decision to ban automatic refill programs (aka autofill) on waste created by these programs and the potential harm to patients. Automatic refill programs create a push of medication to participants, which may result in unused stockpiles and therapeutic duplication.

Over the last several years, MO HealthNet observed:

- *Participants receiving medications that were discontinued months prior;*
- *Multiple strengths of the same medication when the prescriber changed doses but the pharmacy continued to autofill both;*
- *Multiple products in the same drug class when the prescriber changes medications, but the pharmacy fills the old and the new medication; and*
- *Pharmacies filling “as needed” medications each month, including migraine medications, rescue inhalers, and COVID tests, among others.*

Issues created by automatic refill programs are often not caught until an annual visit with the prescriber.

According to [Federal Fiscal Year 2021 DUR Survey](#), twenty-seven states have policies prohibiting the auto-refill process.

Can my pharmacy still offer Medication Synchronization Programs?

Yes, MO HealthNet does allow pharmacies to have a Medication Synchronization Program. Medication Synchronization Programs are designed to allow a participant to receive all maintenance medications on the same day. Before refilling any medications, the provider contacts the participant or the participant’s responsible party to detect any new, discontinued or changed medications. The provider only refills those medications requested by the participant or the participant’s responsible party and coordinates pickup or delivery.

Does MO HealthNet offer an additional payment for Medication Synchronization Programs?

No, MO HealthNet does not make a separate payment to the pharmacy for medication synchronization. MO HealthNet reimburses pharmacies for the ingredient and dispensing fee based on the current reimbursement methodology.

What documentation does my pharmacy need to provide as proof of refill request in case of an audit?

Electronic, verbal, or written requests to refill are acceptable. The presence of an available refill on a prescription does not constitute a current or future refill request. Pharmacies must receive an explicit request from the participant or the participant's responsible party prior to refilling a prescription.

Can long-term care (LTC) pharmacies continue to cycle-fill medications?

Yes, cycle filling for a participant residing in a skilled nursing facility, group home, or assisted living arrangement does not constitute an automatic refill program as long as the pharmacy and facility staff have a policy and procedure in place to prevent medication that is discontinued or otherwise unneeded from being billed to MO HealthNet. Cycle-fill medication that does not follow the policy and procedure between the pharmacy and facility may be subject to administrative action.

Can prescribers still provide a 90-day supply prescription?

MO HealthNet has a 31-day maximum supply restriction on claims submitted for most prescriptions dispensed to participants. For a exceptions to the 31-day maximum fill limit, see [Pharmacy Provider Manual](#) Section 13.6.D(1).

Can a prescriber write a prescription for a medication with refills?

Yes, however, the presence of a refill on a prescription does not constitute an explicit request by the participant or the participant's responsible party to refill the prescription. Prior to refilling the prescription, the participant or the participant's responsible party must explicitly request the refill.

Can my pharmacy automatically send medication refills to participants who did not request a refill?

No, pharmacies cannot automatically refill prescribed medications, devices, or supplies at regular intervals without an explicit request from the participant, or the participant's responsible party, for each refill.

Does the ban on automatic refill programs apply to all MO HealthNet participants, including dual eligible participants and participants with other primary insurance?

Yes, the MO HealthNet ban on automatic refill programs applies to all MO HealthNet participants, including dual eligible participants and participants with other primary insurance.

Why did MO HealthNet not notify providers sooner of this change?

The Secretary of State [published](#) the proposed rule on January 17, 2023. MO HealthNet accepted public comments within 30 days of publication (January 17, 2023 – February 16, 2023). MO HealthNet received no timely public comments opposed to the proposed rule.