Combat the Opioid Epidemic

Goal Leader:
Julia Hearthway, Director, Office of Workers' Compensation Programs

Deputy Leader:
Antonio A. Rios, Director, Division of Federal Employees' Compensation

Overview

Goal Statement

- o By September 30, 2019, reduce both the percentage of initial opioid prescriptions and duration of new opioid prescriptions for federal employees with work-related injuries by 30 percent from the FY 2016 baseline.

Challenge

- o The nation is facing an epidemic of opioid overuse. One of the areas in which we can have an impact is reducing the rate of new addictions. To that end, it is imperative that initial encounters with prescription opioids are limited in supply and duration only to what is appropriate and necessary.
- o Instituting and monitoring appropriate opioid treatment requires the use of a flexible information technology platform that can seamlessly and interactively connect dispensing pharmacies, the Federal Employees' Compensation Act (FECA) claims database, a Pharmacy Benefits Manager (PBM), and the bill processing contractor. Unfortunately, such a system is not currently in place for FECA claims and there are challenges that limit Office of Workers' Compensation Programs (OWCP's) ability to quickly implement additional opioid controls.

Opportunity

- o [CDC's Guideline for Prescribing Opioids](#) states that nonpharmacologic therapy and nonopioid pharmacologic therapy are preferred for chronic pain, and clinicians should consider opioid therapy only if benefits are anticipated to outweigh risks to the patient. In accordance with 20 C.F.R. § 10.800, OWCP's Division of Federal Employees' Compensation (DFEC) may require prior-authorization for opioid therapy to reduce the duration of new opioid prescriptions in its injured federal worker population.
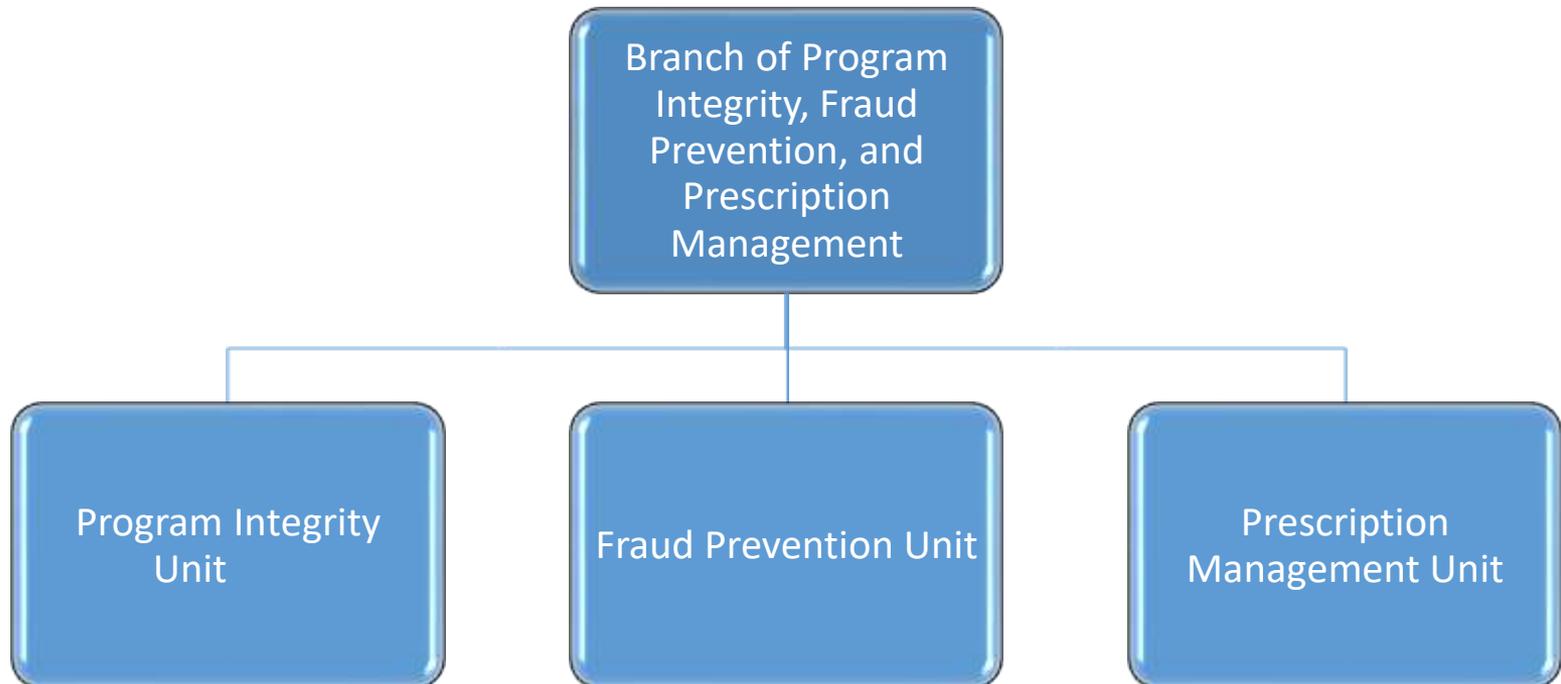
Leadership

Core Team: Office of Workers' Compensation Programs

Division of Federal Employees' Compensation

Branch of Program Integrity, Fraud Prevention, and Prescription Management

Point-of-Contact: Jennifer Valdivieso

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                    │ Integrity, Fraud    │
                    │ Prevention, and     │
                    │ Prescription        │
                    │ Management          │
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Goal Structure & Strategies

<u>Strategies</u>

- Establish a Prescription Management Unit to review Letters of Medical Necessity (LMNs) written in support of opioid prescriptions which would also include alternative treatment plans/options, second medical opinion examinations, and medical record reviews.

- Use the Program Integrity Unit to identify risky opioid prescribers based on Morphine Equivalent Dosing (MED), through analysis and cross-matching of our different data sources.

- Contact high opioid prescribing physicians directly to communicate opioid prescribing guidelines and agency policy requirements.

- Collaborate with other government and private payers to refine initial authorization protocols along with the alignment of potential industry standards in the prescribing of opioids.

- Procure PBM services to assist in the management of pharmaceuticals including opioids.

Summary of Progress – FY 18 Q4

OWCP continues to manage and monitor initial opioid prescriptions and the duration of new opioid prescriptions past 29 days.

Preliminary results for FY 18 show that OWCP reduced initial opioid prescriptions and the duration of new opioid prescriptions for federal employees with work-related injuries by 56 percent from the FY 2016 baseline.

OWCP will provide the final results for FY 18 in FY 19 Q2 update.

Additionally, OWCP completed all key milestones for FY 18. The Agency completed the following milestone in FY 18 Q4:
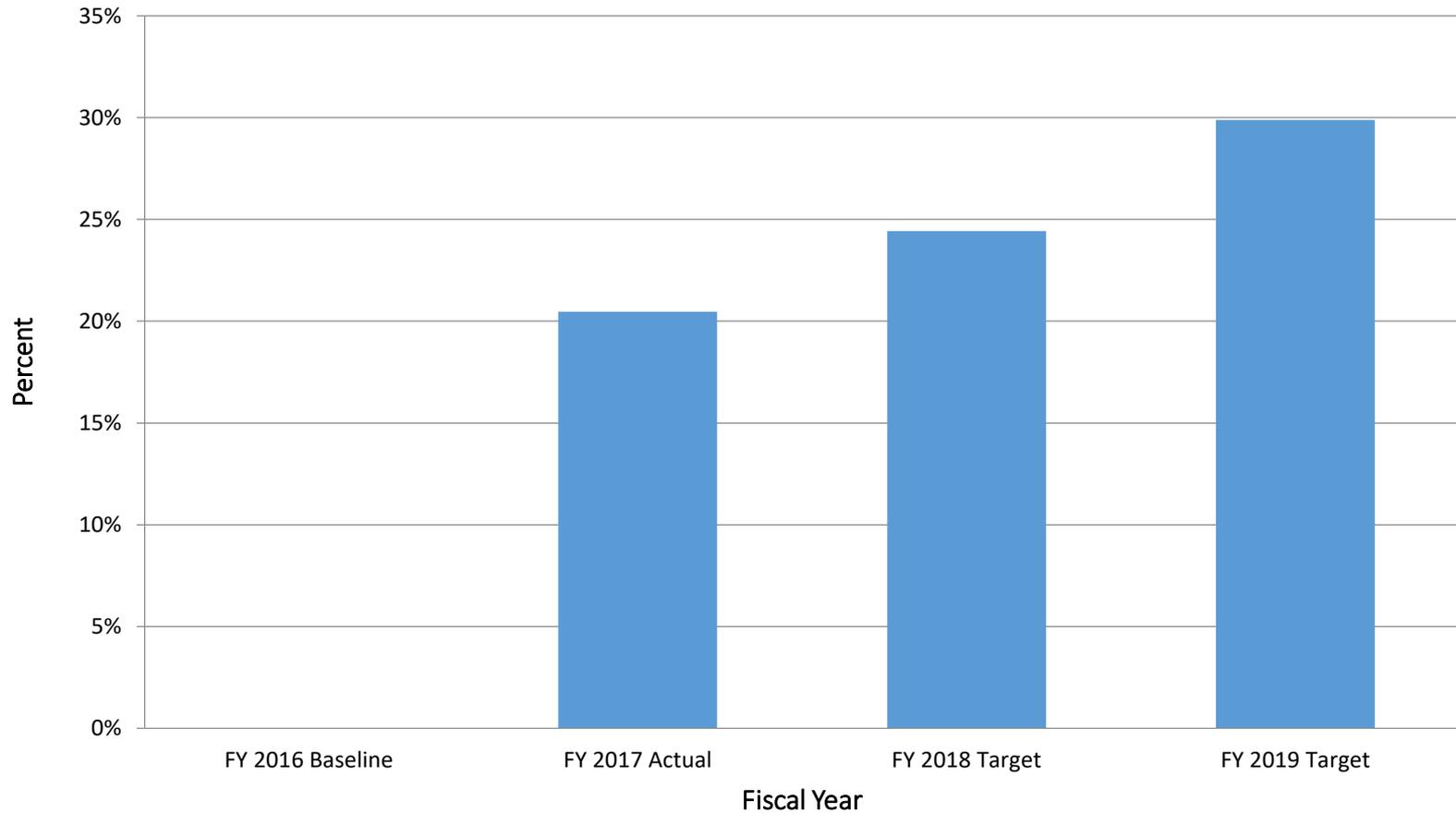
o   Cleared new policy internally in the Department and then published it on the DFEC website.

Key Milestones

Milestone Summary					
Key Milestones	Milestone Due Date	Milestone status	Change from last month	Owner	Anticipated Barriers or other Issues Related to Milestone Completion
Present draft legacy opioid user policy documents to other payers, government agencies, national organizations, and Office of National Drug Control Policy (ONDCP) for review and comment	1/31/2018	Complete	No	DFEC	
Finalize recruitment of Operations/Data Analyst Lead and Fraud Analysts for the Program Integrity Unit	3/1/2018	Complete	No	DFEC	
Complete analysis of First Data Bank and related data sets to determine reliable method for calculation of MED per claimant and per prescriber	3/1/2018	Complete	No	DFEC	Staff pharmacist compared various Federal and state conversion factors as well as cross-matched several data sources to calculate MED per claimant/prescriber.
Finalize recruitment of Supervisors, Medical Benefit Claims Examiners, and Senior Claims Examiners for the Prescription Management Unit	4/1/2018	Complete	No	DFEC	
Finalize PBM service requirements	4/15/2018	Complete	No	OWCP	
Clear new policy internally in the Department and then have it published on the DFEC website	4/30/2018	Complete	Yes	DFEC	
Send targeted letter to both high volume and high MED prescribing physicians regarding OWCP opioid policy	4/30/2018	Complete	No	DFEC	
Implement new legacy opioid user policy that incorporates recommendations to bring DOL into alignment with potential industry standards	6/15/2018	Complete	No	DFEC	
Publish request for proposal for PBM services	8/1/2018	Complete	No	OWCP	

Key Indicators

Percent Reduction of Initial Opioid Prescriptions and Duration of New Opioid Prescriptions

Data Accuracy and Reliability

- **Means used to verify and validate measured values:** Medical providers submit bills electronically and the Office of Workers' Compensation Programs (OWCP) processes payment through the automated Central Bill Pay (CBP) System. The automated system performs a series of edits and checks to ensure that all required fields in the medical bill are complete before the Agency authorizes payment. Each month, the program utilizes medical bill pay pharmacy data from OWCP's CBP System to identify new opioid prescriptions and those new prescriptions exceeding 29-days. An OWCP-contracted Data Scientist writes the data script to produce the data files and a different OWCP-contracted Data Scientist conducts a peer review. A Federal Operations Research Analyst verifies and validates the data script and the Federal Senior Policy Advisor reviews the resulting file to ensure that it is complete and produces all data in the correct fields.

- **Sources for the data:** Each month, the program utilizes medical bill pay pharmacy data, from OWCP's CBP System to identify new opioid prescriptions and those new opioid prescriptions exceeding 29-days (which is the numerator). The denominator is all Federal Employees' Compensation Act (FECA) cases that received medical benefits. The goal measures the percent change of a given fiscal year's result from the established baseline.

- **Level of accuracy required for the intended use of the data:** The medical bill pay pharmacy data include point of sale information for all pharmacies that fill a claimant's opioid prescription under the FECA. The FECA program uses point of sale documentation to determine whether the claimant's physician prescribed an opioid within the previous 180-days (new opioid prescription) and the duration of that new prescription. The program does not exclude any pharmacy point of sale information in priority goal reporting and considers the data used to calculate the goal free from significant error.

- **Limitations to the data at the required level of accuracy:** There can be a time lag between when the pharmacy fills a prescription and when the pharmacy submits a medical bill to OWCP for payment, which could result in an incomplete data set.

- **How the agency has compensated for such limitations if needed to reach the required level of accuracy:** Due to the time lag between when the pharmacy fills a prescription and when the pharmacy submits a medical bill to OWCP for payment, the program submits final measure results two quarters after the end of the fiscal year in order to ensure that all data are complete and included in the calculation of the goal. In order to provide preliminary results at the end of the fiscal year, OWCP uses data analytics and modeling to develop an estimate with an acceptable confidence interval.

Additional Information

<u>Contributing Programs</u>

Organizations:

- o [U.S. Department of Labor/Office of Workers' Compensation Programs/ Division of Federal Employees' Compensation](#)

Program Activities:

- o [Division of Federal Employees' Compensation, Branch of Program Integrity, Fraud Prevention, and Prescription Management](#)

Regulations:

- o [20 C.F.R. § 10.800](#)

Tax Expenditures:

- o N/A

Policies:

- o FECA Opioid Prescribing Guidelines

Other Federal Activities:

- o OWCP will work with the U.S. Department of Health and Human Services, ONDCP, and other insurance payers to develop opioid policies in 2018.

Additional Information

Stakeholders

Key stakeholders for this goal are mainly external to OWCP and include federal departments/agencies and the United States Postal Service.

OWCP has briefed the Office of Management and Budget, the American Federal of Government Employees, the National Association of Letter Carriers, the American Postal Workers Union, the Workers' Injury Law Advocacy Group, and Federal Agencies.