

RESOLUTION 27-07A

Title: Unnecessary Drug and Medication Regimen Review
Introduced by: Domenic R. Federico, MD, for the Kent County Delegation
Original Author: Jayne E. Courts, MD
Referred to: Reference Committee A
House Action: Adopted as Amended

Whereas, decisions made regarding the indications, risk/benefits, and duration of treatment are part of the practice of medicine, and

Whereas, the Centers for Medicare and Medicaid Services (CMS) is not licensed to practice medicine, and

Whereas, CMS guidelines for federally mandated drug regimen review previously focused on antipsychotic medications, and

Whereas, these guidelines required attempts at gradual dose reduction, and

Whereas, the new F-tags for long-term care facilities (F329 Unnecessary Drugs and F428 Medication Regimen Review) has expanded the drug review to include all medications, and

Whereas, the review requires gradual dose reduction of all psychoactive medications such as antidepressant and anxiolytic medications during at least two separate quarters during the first year of use and annually thereafter, and

Whereas, Scope and Severity criteria are now being applied to these F-tags which can result in termination of provider agreements with CMS, denial of payment, and civil monetary penalties; therefore be it

RESOLVED: That MSMS review the new State Operations Manual Interpretive Guidelines/Surveyor Guidance F-tags F329 and F428 for inappropriate expansion of required medication reduction of all psychoactive medications; and be it further

RESOLVED: That MSMS review the new State Operations Manual Interpretive Guidelines/Surveyor Guidelines F-tags F329 and F428 for extensive documentation of medical decisions; and be it further

RESOLVED: That the Michigan Delegation to the AMA ask the AMA to review Michigan State Medical Society's findings regarding the new State Operations Manual Interpretive Guidance F-tags F329 and F428 and make recommendations to the Centers for Medicare and Medicaid Services, including any reimbursement changes needed.

WAYS AND MEANS COMMITTEE FISCAL NOTE: NONE