



January 13, 2023

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Molina Healthcare of New Mexico is thankful for the opportunity to provide feedback regarding the proposed Standardized Health Plans, particularly related to the following pharmacy design components.

- 6-tier Pharmacy Benefit – Molina found, after reviewing the design for the 6-tier proposed structure, there are inconsistencies when analyzing typical industry standards, also, when comparing to standard plan designs from CMS, it was found to be further misaligned when taking into consideration the mandate for preferred specialty cost-sharing to be a lower rate than non-preferred non-specialty drug cost-sharing.
 - Molina suggests for consideration that designs more closely align with such standards to allow for adoption, implementation, data collection and review in early stages of plan standardization.
- Preferred and Non-preferred Separation – Molina would like to note that some issuers who don't currently split specialty into preferred and non-preferred levels the separation of and rate arrangement consisting of the preferred specialty tier with a lower rate than the non-specialty non-preferred tier rate can present some significant challenges administratively of offering separate types of pharmacy benefit structures within the same state.
 - Molina suggests for consideration setting the preferred specialty drug cost-sharing higher than the non-preferred drug tier and allowing issuers to offer plans with a single specialty tier if they don't break specialty up into preferred and non-preferred. The unique 6-tier proposal for the standard plans in such a manner may pose operational challenges.

We hope to continue this key discussion and collaboration as we move forward in this process.

Respectfully,

A handwritten signature in blue ink, appearing to read "Trey LaFleur".

Trey LaFleur
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