



# Colorado Medical Society

*"Advocating excellence in the profession of medicine"*

October 11, 2018

Michael Conway  
Interim Commissioner of Insurance  
Colorado Division of Insurance  
1560 Broadway, Suite 850  
Denver, CO 80202

Subject: Proposed Amended Regulation 4-2-49

Dear Commissioner Conway,

This letter is in response to the Division's request for comments concerning the new language added to regulation 4-2-29, concerning certain opioid dependence treatment drugs as required by House Bill 18-1007.

As you are aware, the intent of this legislation was to remove any barriers to patients receiving the medications they need to treat opioid dependence. We believe that any instructions the carriers give to physicians concerning prior authorization requirements either in their policy and procedure documentation or on their request form, need to clearly state that prior authorization is not necessary (1) for drugs approved for the treatment of opioid dependence for the first request within a twelve-month period; or (2) if it has been longer than twelve months since the first prescription request was submitted.

Based on this we would suggest that the form, Appendix A, be revised to make it clear that authorization is not required in these instances. For example:

Requested Drug Name:

Is this drug intended to treat opioid dependence?

Yes ☐ No ☐

If Yes, is this a first request for prior authorization for this drug?

Yes\* ☐ No ☐

***\*If Yes, prior authorization is not required.***

If No, what was the date of the first request? Date: \_\_\_\_\_ \*

***\*If greater than twelve months since the first request, prior authorization is not required.***

We appreciate the opportunity to provide comments. Please let us know if there are any questions.

Respectfully,

Debra J. Parsons, MD, FACP  
President, Colorado Medical Society