

Testimony on H.B. No. 5250 (RAISED) AN ACT PROHIBITING REQUIREMENTS FOR PRESCRIBING CLINICALLY INAPPROPRIATE QUANTITIES OF OUTPATIENT PSYCHOTROPIC DRUGS.

February 24, 2020

I am a Psychiatric-Mental Health Nurse Practitioner and Director of the Psychiatric Mental Health Nurse Practitioner Program at Yale University School of Nursing. I strongly urge you to support HB 5250 and would like to provide reasons this bill is important for patient and public safety.

Recently insurance companies have actively mandated the supply of medications prescribed for a patient to be increased from smaller supplies to required dispensing of 90 day supplies. This is problematic for many reasons. First, **patient centered safe prescribing practices are usurped** when insurers make dispensing decisions without the knowledge or decision making skills to determine the safe amount of medication to dispense. These decisions are based on complex factors including face to face assessment of needs, the course of treatment (whether initiating, titrating, or tapering an agent), the safety profile of the medication (including knowledge of the Lethal Dose of the agent). The provider considers the person's ability to manage multiple days or weeks' worth of medication, particularly problematic in the presence of cognitive problems, substance use, social or safety issues including the presence of suicidal thought, intent, or patient impulsivity. Other factors, unknown to insurers impact dispensing decisions, including the social and physical environment of the patient, where the medications are stored, and issues of access to medication by family members. Clearly, knowledge-based decision making skills are involved in determining the amount of medication appropriate to dispense to a patient. Second, **making dispensing decisions infringes on the scope of practice of a licensed health care provider** and steps beyond the bounds of an insurers role.

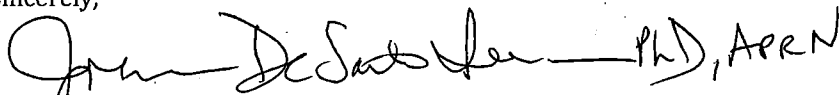
Third, this policy by insurers, in combination with automated refill procedures of most pharmacies **promote large supplies of medications to be in the hands of vulnerable patients and their family**. Automatic refills in addition to the new required 90 day supply often result in patients having more than a 4 month supply of medications available. The pernicious use of 'auto-refills' is extremely difficult to stop.

Fourth, **psychotropic agents in particular, can be lethal, sometimes in small amounts**. 90 day supplies result in the collection of lethal amounts of medication, and is a risk for individuals (or family members) who are depressed, suicidal, impulsive or psychotic. It is irrational to allow practices resulting in medication stock piling after learning the lessons of the opioid crisis on overdose risks.

Finally, insurers 'requiring' this action, and not covering the cost of a smaller supply, **places a cost burden on the patient and family**, many of whom are unable to afford to fill overpriced smaller supplies of 30 days or less. **Patients end up paying out of pocket for covered medications** when this happens. I have had angry patients contact me to tell me that I was costing them money because the smaller supplies of an agent result in patients having to pay out of pocket for the medication, despite them having insurance coverage. In other cases, patients have stopped successful treatment due to not being able to afford the medication.

Please approve this bill. It is irresponsible for an insurance company **to require** a prescriber to provide a 90 day refill. This bill is one positive step in resolving this problem for both patients and prescribing providers. Thank you for your consideration of this important issue. If you would like to discuss any aspect of my testimony, please contact me at: [joanne.iennaco@yale.edu](mailto:joanne.iennaco@yale.edu)

Sincerely,



Joanne DeSanto Iennaco PhD, PMHNP-BC, PMHCNS-BC, APRN  
Associate Professor of Nursing & Psychiatry  
Director, Psychiatric-Mental Health Nurse Practitioner Program  
Yale University School of Nursing, 400 West Campus Drive, Orange, CT 06477  
15 Little Hollow Road, Madison, CT 06443