

## **Rural Area Flexibility Analysis (RAFA)**

### **1. Types and estimated numbers of rural areas:**

The proposal updates the process for requesting prior approval for the drug formulary to include medical marijuana and updates the drug formulary itself. This process must be used for all prior authorization request (PARs) for medical marijuana across New York State, including rural areas. Currently medical marijuana prior authorization requests are processed through the Medical Treatment Guidelines variance process. This change will have the medical marijuana prior authorization requests flow through the Formulary's prior authorization process. It is a change in form. The substance of these requests and criteria for evaluation remain the same.

### **2. Reporting, recordkeeping and other compliance requirements; and professional services**

The same compliance and recordkeeping requirements apply to rural areas as metropolitan ones.

No special professional services should be required by rural or any other areas.

### **3. Costs**

The only costs to rural areas would be the minimal costs associated to moving the already existing medical marijuana process from the variance process to the formulary prior authorization process and adding new drugs on the Formulary to any existing programming (a process that has occurred without issue from rural areas regularly since the Formulary was adopted at the end of 2017).

### **4. Minimizing Adverse Impact**

The proposed regulations were written to provide greater clarity and detail to avoid confusion and provide for a smooth implementation of the updated PAR process in including medical marijuana.

### **5. Rural area participation**

The Board has and continues to accept feedback from any entities, including rural areas, when updating the drug formulary, and will duly consider all public comments received from rural areas during the public comment period.