



Academy of
Managed Care
Pharmacy®

May 27, 2016

The Honorable James T. Welch
Senate Chair
Joint Committee on Health Care Financing
The Commonwealth of Massachusetts Legislature
State House
Room 309
Boston, MA 02133

The Honorable Jeffrey Sanchez
House Chair
Joint Committee on Health Care Financing
The Commonwealth of Massachusetts Legislature
State House
Room 226
Boston, MA 02133

RE: House Bill 791 – Step Therapy

Dear Senator Welch and Representative Sanchez:

The Academy of Managed Care Pharmacy (AMCP) is writing to express our concerns with House Bill 791 – an act mandating that health plans and other health insurers follow a government mandated Step Therapy Exception Determination process.

AMCP is a national professional association of pharmacists and other health care practitioners who serve society by the application of sound medication management principles and strategies to improve health care for all. The Academy's nearly 8,000 members, including 239 living and practicing in Massachusetts, develop and provide a diversified range of clinical, educational and business management services and strategies on behalf of the more than 200 million Americans covered by a managed care pharmacy benefit.

AMCP supports step therapy programs that are consistent with national treatment guidelines, quality measures and medical evidence. To ensure appropriate use of step therapy, AMCP supports the use of authorization programs that when properly implemented may help avoid inappropriate drug use and promote the use of evidence-based drug therapy. Such efficient and effective use of health care resources can minimize overall medical costs, improve patient access to more affordable care, and provide an improved quality of life.

Insurers and health plans have experience with evaluating peer-reviewed medical literature to design step therapy protocols consistent with current scientific, medical, and pharmaceutical treatment evidence and

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guidelines. Therefore, to ensure that individuals have continued access to appropriate medication therapy, managed care plans must retain the flexibility to make judgments regarding the reliability of medical literature when designing step therapy programs. The managed care plan's pharmacy and therapeutic (P&T) Committee, which includes physicians, pharmacists, and other health care providers considers all of the clinical evidence as part of its review process.

The P&T Committee is also responsible for formulary development, which is dynamic and continually revised as new medications become available and as medical and clinical evidence evolves. The P&T Committee utilizes its collective knowledge, i.e., physicians, pharmacists and other health care professionals with expertise in clinical aspects of prescription drugs and drug use. The P&T Committee meets regularly to review and evaluate the medical and clinical evidence from the literature, relevant patient utilization and experience, economic data, and provider recommendations to determine which drugs are the safest, most effective, and produce the best medical results.

House Bill 791 provides that an insurer may use its existing medical exceptions process to satisfy the requirement for a Step Therapy Exception Determination. AMCP supports the ability of health plans and other health insurers to use an existing process to handle these requests. However, AMCP cannot support the provisions in Sections 47CC(b)(3), 8FF(b)(3), 4FF(b)(3), and 4X(b)(3), which then mandate when an exception should be granted. The health plans and other health insurers have criteria for resolving medical exception requests. There is no need for the Commonwealth to mandate the when an exception determination should be granted.

One of the goals of managed care pharmacy is to ensure that our patients receive the right drug at the right time and at the most affordable cost. The use of a step therapy program is one of the tools that managed care pharmacy utilizes to deliver clinically proven quality care to our patients. When we achieve that goal, everyone in the health care system reaps the benefits; the patient, the prescriber, the payor and the managed care plan.

We appreciate the opportunity to share our views on the step therapy override determination process. We recognize that the step therapy process can be a contentious issue; however, step therapy does provide benefits to the patient. It is based on sound clinical and quality reviews. For the stated reasons, we respectfully request that you delete Sections 47CC(b)(3), 8FF(b)(3), 4FF(b)(3) and 4X(b)(3) from House Bill 791. If those provisions are not deleted, we respectfully request that this legislation not receive favorable consideration.

If you have any questions, you may AMCP's Massachusetts advocacy leader, Dennis Lyons at (617) 312-5906 or hiddgl@gmail.com. You may also contact the AMCP Director of Legislative Affairs, Reginia Benjamin, at (703) 683-8416 or rbenjamin@amcp.org.

Sincerely,



Susan A. Cantrell, RPh, CAE
Chief Executive Officer