

April 10, 2020

Administrator Seema Verma
Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
7500 Security Blvd.
Baltimore, MD 21244-1850

RE: Prior Authorization and Step Therapy Processes

Dear Administrator Verma,

On behalf of the millions of Americans living with chronic, disabling, and life-threatening medical conditions, the undersigned patient and provider organizations have joined together to express our concern regarding the ongoing burdensome prior authorization (PA) requirements administered by Medicare Advantage and Part D Plans. During this time of a pandemic, physicians have less resources and time at their disposal to manage multiple PAs. With so much uncertainty patients should not be worried about whether or not they can access a necessary treatment or service. Therefore, **we call on the Centers for Medicare and Medicaid Services (CMS) to encourage Medicare Advantage and Part D plans to relax PA and step therapy standards for medically necessary prescribed or ordered treatments and services during national pandemics.**

You recently stated at a meeting of the American Medical Association that “Prior-authorization requirements are a primary driver of physician burnout ,... and, even more importantly, patients are experiencing needless delays in care that are negatively impacting the quality of care.” We appreciate CMS recognizing that when processes are not in place to quickly review and approve requests for treatments, tests, services and supplies that may be medically necessary for the beneficiary, it can adversely affect access to medically necessary patient care. The COVID-19 pandemic has highlighted the negative effect of prior authorization (PA) and step therapy on the delivery of care, particularly this impact on delayed care. CMS should consider tools it can use in the future to alleviate this burden during emergency situations.

During this time of a pandemic, physicians are quickly adapting and implementing new technology to ensure they can continue to see patients. At the same time, they are working to ensure they can continue to operate their businesses; the burden is especially heavy on small and solo practices right now. A recent survey administered by the American Academy of Dermatology Association (AADA) found that PA requirements have added to dermatologist office costs an average of \$40,000 per year. At a time of when practices are worried about keeping their doors open, it is not the time for them to worry about going through PA processes to ensure their patients have necessary access to medications. We recommend **CMS immediately advise Medicare Advantage and Part D plans to relax PA and step therapy standards for prescribed or ordered treatments during national pandemics.**

We are concerned that any formulary changes that occur during this pandemic will severely limit patient access to needed, effective therapies and put patients at risk for worsening disease, severe flares, or worse, preventable complications. Often, patients must schedule to meet with their health care provider, complete lab work and discuss other therapeutic options if forced to

switch to a different treatment. In the current environment office visits are much more challenging and could further delay the patient accessing the necessary treatment. Importantly, it is not advisable for a patient to have to visit a pharmacy multiple times right now due to a PA. On top of delaying care, the patient is put in even more at risk in this setting. Especially during this public health emergency, **we recommend that stable patients continue to be on their prescribed treatments and any PA requirements are relaxed.**

Supply chains are threatened with drug shortages when overburdened or disrupted. If a patient's treatment is compromised due to a drug shortage, they should not be burdened with having to go through a PA for that treatment. Continued access is important during this time of social distancing and limited access to healthcare services.

Physicians are focusing on patients who require urgent or necessary care and PA creates another hurdle to the patient trying to access this care. PA and appeals policies should not unduly burden physicians or patients or prevent them from achieving optimal outcomes. Delays can cause irreparable harm to patients in need of specific procedures. PA policies that place a third party, with no knowledge of the complexity or full history of a patient's condition, in a decision-making position are not only inappropriate, but they also impede patients' access to the most effective procedure. Additionally, physician offices may be short staffed or have limited resources now to process a PA for a time-sensitive, medically necessary service. **We recommend CMS advise Medicare Advantage to relax PA standards for necessary medical services during national pandemics.**

This access issue is widespread, which is why we brought together a broad range of specialties as well as patient advocates. We respectfully request that CMS address these access issues as soon as possible so that patients can have access to these affordable and effective treatments and services. We look forward to additional opportunities to work together on this issue and to provide feedback that may help guide policy development. Please contact Ashley John, Manager in Advocacy and Policy at ajohn@aad.org or (202) 609-6332 if you have any questions or if we can provide additional information. Thank you for your attention to our concerns.

Sincerely,

Allergy & Asthma Network
Alliance for Patient Access
American College of Cardiology
American Academy of Dermatology Association
American Academy of Family Physicians
American Academy of Ophthalmology
American College of Allergy, Asthma and Immunology
American College of Mohs Surgery
American College of Rheumatology
American Gastroenterological Association
American Osteopathic Association
American Society for Dermatologic Surgery Association
American Society for Mohs Surgery
American Society of Hematology

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American Urological Association
Arthritis Foundation
Association of Black Cardiologists
Cutaneous Lymphoma Foundation
Derma Care Access Network
Dermatology Nurses' Association (DNA)
Foundation for Ichthyosis & Related Skin Types, Inc.
Genetic Alliance
Headache & Migraine Policy Forum
International Pemphigus Pemphigoid Foundation
Lupus Foundation of America
Medical Group Management Association
National Eczema Association
National Psoriasis Foundation
PXE International
Siegel Rare Neuroimmune Association
The Sturge-Weber Foundation
Tuberous Sclerosis Alliance
Vitiligo Support International