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February 14th, 2019

Senate Public Health and Welfare Committee
SW 8th & SW Van Buren
Topeka, KS 66612

Re: Support SB 93

The Coalition of State Rheumatology Organizations (CSRO) is a national organization composed of over 30 state and regional professional rheumatology societies. We are writing on behalf of providers of rheumatology care in Kansas that number amongst our members. CSRO was formed by physicians to ensure excellence, and access to the highest quality care, for patients with rheumatologic, autoimmune, and musculoskeletal disease. It is with this in mind that we write to you in support of SB 93.

As you consider SB 93 CSRO would like to convey its support for reforming step-therapy protocols.

The implementation of step-therapy protocols without transparent and consistent exceptions pathways available to physicians has had serious consequences for patients in the state of Kansas. CSRO recognizes that there can be a role for utilization management, but when utilization controls are so stringent that insurers have in effect begun practicing medicine, the balance is decidedly uneven. This is unlicensed, it is a safety issue, and patients are paying the price.

Rheumatologists treat patients with extremely complex chronic conditions such as rheumatoid arthritis (RA). Complex chronic conditions such as RA are temperamental and present unpredictably on a case-by-case basis. This necessitates a high degree of individualized care and attentive management. Stabilizing these conditions is a process that can take months or even years of trial and error. The resulting course of treatment must carefully balance each patient's unique medical history, disease environment, and drug interactions. Step-therapy protocols are a one-size fits all approach that hampers treatment decisions arrived at through the course of the doctor-patient relationship. Existing appeals pathways have failed to rectify these problems.

Health plans do not devote the time, resources, or expertise that is required to properly evaluate the treatment decisions being made between patients and their physicians. Step-therapy protocols may

provide reasonable guidelines for broad populations, but patients with complex chronic conditions require a different approach. There must be a role for the doctor-patient relationship, and there must be clear and transparent scenarios under which physicians can override decision-making by health plans that endangers patients.

The stakes for these patients are high. Slight deviations in treatment and variations between drugs, even those in the same therapeutic class, can cause serious adverse events. The resulting disease progression can be irreversible, life threatening, and can cause the patient's original treatment to lose effectiveness.

SB 93 does not prohibit insurers from using step therapy, but seeks to balance cost containment with patient needs.

More specifically, it protects patients by:

- (1) Ensuring that step therapy programs are based on clinical guidelines developed and endorsed by a multidisciplinary panel of experts, and based on high-quality studies, research, and medical practice;
- (2) Ensuring that the exceptions process for step therapy is explicit, transparent, and accessible to patients and health care providers; and
- (3) Establishing a basic framework that enables physicians to override step therapy protocols where it is medically necessary.

For these reasons CSRO urges you to support SB 93.

Respectfully,

A handwritten signature in black ink that reads "M. Feldman". The signature is fluid and cursive, with a large initial "M" and "F".

Madelaine H. Feldman, MD, FACR
President, CSRO