October 18, 2017

Don Wright, MD, MPH,
Acting Secretary
Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, DC, 20201

Re: MassHealth Section 1115 Demonstration Amendment Request

Dear Acting Secretary Wright,

On behalf of the Cancer Support Community (CSC), an international nonprofit organization that provides support, education, and hope to cancer patients, survivors, and their loved ones, we would like to take this opportunity to comment on the MassHealth Section 1115 Demonstration Amendment Request, which was not authorized by the state legislature. We are opposed to the proposal included in the amendment request that will impose a closed formulary in the state’s Medicaid program, limiting access to many established as well as newly approved drug therapies.

Every cancer patient is unique, with a diverse medical history, varying comorbidities, and differing lifestyle factors. Prescription medications themselves are also unique, with different indications, mechanisms of action, and side effects. CSC is concerned that the creation of a closed formulary will severely limit the ability of providers to make the best medical decisions for their patients, based on the patient’s individual needs.

A formulary that may only cover one or two drugs in a class will harm patients and potentially raise medical costs as patients do not react, or react poorly, to the limited medications that can be prescribed to them. This is particularly true for cancer patients who often receive personalized or combination therapy. Rather, providers should be prescribing based on clinical guidelines and a shared decision making process with the patient. The closed formulary has the potential to create delays in appropriate care, cause patients to forgo care completely, increase patient distress, and ultimately even raise health care costs. CSC conducted a study in 2016 on patient access to care and we know that 25% of patients experience delays in accessing needed care (due to policy barriers such as prior authorization or step therapy), with Medicaid patients experiencing the greatest care delivery delays. The proposed exceptions process outlined in the waiver amendment simply cannot ensure uninterrupted access to needed drugs, particularly for patients living with cancer or other life threatening diseases.
We are also very concerned with the new proposed policy allowing the program to deny access to new medications that the Commonwealth believes do not have enough “clinical evidence”. Drugs that have been approved through the accelerated approval pathway receive rigorous clinical review just like other drugs and are targeted for diseases where there is an unmet need with few treatment options. Denying patients access to these live saving medications that have been approved by the Food and Drug Administration undermines both individual patient choice and clinical progress.

The Medicaid program was created to serve the patients in most dire need who have nowhere else to turn for their health care. It serves thousands of people in Massachusetts who depend on high-quality and consistent coverage to help them manage serious and chronic health care needs. As an organization whose focus is on access to quality, affordable, and comprehensive coverage for those impacted by cancer, CSC urges the Centers for Medicare and Medicaid Services to reject Massachusetts’ 1115 amendment request in its current form. This amendment could greatly restrict access to life saving therapies and do harm to the health and wellbeing of cancer patients across the state.

On behalf of millions of cancer patients and their loved ones, we stand ready to work together with you to develop policies that will ensure patients have access to comprehensive care and innovative and medically necessary therapies. If I can provide more information, please do not hesitate to reach out to me at Linda@cancersupportcommunity.org or 202.650.5382.

Sincerely,

Linda House
President
Cancer Support Community Headquarters