



February 9, 2017

Members of the Insurance and Real Estate Committee  
Insurance and Real Estate Committee  
Legislative Office Building, Room 2800  
Hartford, CT 06106

**Re: Opposition to Proposed Bill No. 545 – “An act concerning a study of requests by health care providers to override step therapy drug regimens for certain cancer patients”**

Dear Members of the Insurance and Real Estate Committee:

On behalf of the Pharmaceutical Care Management Association (PCMA), I am writing to you regarding Proposed Bill No. 545. PCMA is the national association representing America’s pharmacy benefit managers (PBMs), which administer prescription drug plans for more than 266 million Americans with health coverage provided through Fortune 500 employers, health insurance plans, labor unions, state and federal employee-benefit plans, and Medicare.

Patients suffering from metastatic cancer require clinical compassion. Yet, selecting costly brand-name products first is not always the best step in care. The process of step therapy ensures that prescribers consider medically appropriate available therapeutic alternatives before settling on a specific course of therapy. Step therapy can improve quality of care for both patients with multiple medications and the elderly.

Step therapy, requires an enrollee to try a medically appropriate first-line drug, typically a generic alternative to a branded product, when a new therapy is initiated. The prescriber is asked to consider ordering a therapeutic alternative to the brand-name medication or therapy. If that medically appropriate alternative was tried earlier and the patient did not achieve optimal outcome, the branded product is typically approved and dispensed.

In addition, SB 545, is an unnecessary study because all PBMs have processes in place for physicians to request and receive medical exceptions when there is a clinically valid reason for prescribing a specific drug. Pharmacy and Therapeutic committees, comprised of experts that include physicians and pharmacists, develop evidence-based guidelines used in drug management program at the request of plan sponsors, such as step therapy, and ensure cost controls do not impair the quality of clinical care. Many drugs have harmful side effects or interact with other medications; step therapy encourages trying safer, alternative therapies first.

According to the Federal Trade Commission (FTC), “large PBMs and small or insurer-owned PBMs have used step-therapy and prior authorization programs to *lower prescription drug costs and increase formulary compliance.*” The FTC also found that “prior authorization often involves a clinical justification for the use of drugs that are prone to misuse or are especially costly.”<sup>1</sup>

---

<sup>1</sup> Federal Trade Commission, “Pharmacy Benefit Managers: Ownership of Mail-Order Pharmacies,” August 2005, available at <http://ftc.gov/reports/index.htm#2005>. [Emphasis added].



The study's focus on the process of insurers overriding step therapy as well as their response time to such requests does not adequately provide clinically or therapeutically effective information on the treatment of metastatic cancer. Each patient suffering from metastatic cancer requires complex individual clinical and therapeutic treatment. Step therapy is a drug management tool that prevents inappropriate clinical use of particular drugs. For these reasons, PCMA asks you to withdraw Proposed Bill No. 545 from consideration.

Please let us know if we can provide any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Kipper". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Scott Kipper  
Vice President – State Affairs  
Pharmaceutical Care Management Association