June 10\textsuperscript{th}, 2019

Division of Insurance
Colorado Department of Regulatory Agencies
1560 Broadway, Suite 110 D
Denver, CO 80202

RE: Proposed Amended Regulation 4-2-49- Concerning the development and implementation of uniform drug benefit prior authorization process, the required drug appeals process, and the coverage of certain opioid dependence treatment drugs.

Dear Department of Regulatory Agencies:

We appreciate the opportunity to submit comments on Colorado’s proposed amended regulation for uniform drug benefit prior authorization process. Our organizations represent thousands of individuals facing serious, acute and chronic health condition with a unique perspective on what individuals need to prevent disease, cure illness, and manage chronic health conditions. We are committed to ensuring our patient’s have adequate, affordable, and accessible healthcare coverage, especially when it comes to prescription drug benefits.

On behalf our patient communities we serve, we have reviewed the proposed amended regulation 4-2-49, we submit this letter for the Division of Insurance’s consideration as our public comment on the proposed amendment in support for a policy that will give patient’s more transparency and efficiency when utilizing their prescription drug benefits and requesting appropriate treatment options.

Patients with psoriatic disease are at a heightened risk to develop other chronic conditions, including cardiovascular disease and stroke, diabetes and hypertension, as well as depression and anxiety\textsuperscript{1}. Given the uncertain nature of psoriatic disease and varying responses to treatment from our patient’s, it is a significant benefit when our patient community has a clear, timely, and efficient process to accessing the most appropriate therapy for them and their disease.

We support Colorado’s efforts to revise permanent rules to include a standard and expedited timeline for exception requests to prior authorization for non-formulary drug authorization requests. An Institute for Clinical and Economic Review (ICER) report on treatment for moderate-to-severe plaque psoriasis found that on formularies, psoriatic disease therapies are more likely to be listed as non-preferred. Additionally, the same ICER report cautions against barriers to accessing treatments, including those kinds of utilization management protocols and found that all currently approved advanced therapies for psoriasis offer a good value\textsuperscript{2}.

\textsuperscript{1} Journal of American Academy of Dermatology: Joint AAD-NPF guidelines of care for the management and treatment of psoriasis with biologics - April 2019 Volume 80, Issue 4, pages 1029–1072
\textsuperscript{2} Institute for Clinical and Economic Review: Targeted Immunomodulators for the Treatment of Moderate-to-Severe Plaque Psoriasis: Effectiveness and Value - August 03, 2018
Ensuring a determination within 72 hours for a standard exception request and 24 hours for an expedited exception request will help alleviate delays in care, which often exacerbates a patient’s condition. This new process will ultimately better serve patients and create a process that works for all stakeholders. For the psoriatic disease community this means higher treatment efficacy and a reduction in adverse reactions.

Looking ahead, we encourage Colorado regulators to monitor the impact of the rule to ensure that it continues to yield improved medication access for marketplace consumers. We also encourage Colorado regulators when enhancing rules around utilization management policies to continue to have a patient-centered focus which align with clinical practice standards and psoriatic disease guidelines.

We look forward to the adoption of the proposed amended regulation and appreciate your consideration of our comments. If you have any questions about our remarks, please contact Brittany Duffy-Goche with the National Psoriasis Foundation at bduffy-goche@psoriasis.org or 503-546-8364.

Sincerely,

Arthritis Foundation
Colorado Chronic Care Collaborative
Epilepsy Foundation of Colorado
National Eczema Association
National Multiple Sclerosis Society
National Psoriasis Foundation