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March 21, 2019

Commissioner David Altmaier  
Florida Office of Insurance Regulation  
200 East Gaines Street  
Tallahassee, FL 32399

Dear Commissioner Altmaier,

We – the Global Healthy Living Foundation (GHLF) submit this letter to alert you to the perils of step therapy. Step therapy, also known as “Fail First,” is what happens when insurers require patients to first fail alternative therapies to those prescribed by their doctors, thus prolonging crucial time to getting the right treatment for the patient.

By way of background, GHLF is a 20-year-old 501(c)(3) patient organization representing more than 100,000 chronically ill patients and their caregivers across the country. GHLF works to improve the quality of life for patients living with chronic disease by making sure their voices are heard and advocating for improved access to care at the community level. Our patients suffer from chronic conditions including arthritis, psoriasis, gastrointestinal disease, cardiovascular disease and migraine. As a result, these patients incur significant financial burden due to the high cost of the treatments that are necessary to manage their disease. And, it is on behalf of the patients we represent that I am writing to you today to express the need for more protections for patients when insurers use step therapy and fail first policies.

CreakyJoints, a GHLF community, is an online patient resource for people living with arthritis. We are dedicated to building, sustaining and educating people with all forms of arthritis. The majority of our members have rheumatoid arthritis, and I would like to specifically address their concerns regarding step therapy for the treatment of their RA or chronic pain.

About 1.3 million people in the United States are believed to have rheumatoid arthritis a disease that is often subject to fail first insurance company policies. Rheumatoid arthritis is a painful condition that affects all ages, races, and social and ethnic groups. Although there is no cure for rheumatoid arthritis, the disease can be controlled in most people with the use of complex, and often expensive, biologic therapies which can stop disease progression. Early, aggressive therapy to stop or slow inflammation in the joints can prevent or reduce painful symptoms, prevent or reduce joint destruction and deformity, and prevent or lessen disability and other complications.

Here are just a few examples explaining why step therapy strategies are problematic for RA patients and doctors:

- Step therapy or fail first protocols require patients to experiment with various medications before getting the one originally prescribed by their doctor. Oftentimes patients have to “fail” up to five times before they are finally given the prescription that their doctor originally prescribed. The duration of this protocol is left up to the insurance company and can last up to



130 days per medication. During this time the disease can permanently damage joints and reduce movement for the rest of the patient's life.

- Step therapy is time-consuming from a physician and patient standpoint, is more expensive from a direct and indirect out-of-pocket cost perspective, it denies patients the drugs they need when they need them, and creates additional barriers leading people to forgo needed medications.
- Patients with Rheumatoid Arthritis need access to affordable prescription drug coverage to manage their disease.

People living with pain associated with RA, chronic or acute pain need to efficiently and adequately address their needs through the medication intended by their physician. We hope that you will consider these people – many of whom live in Florida when addressing utilization management processes of insurers like fail first.

We hope that you, like us, think patients should succeed first.

Thank you for caring about patients and their need for quality access to care in Florida. We appreciate your thoughtful consideration of this legislation and would be pleased to provide any further information that you may require.

Sincerely,



Corey Greenblatt  
Manager, Policy and Advocacy  
Global Healthy Living Foundation