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Palmetto GBA
Attn: Medical Affairs, AG -275
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RE: GHLF Patient Group Comments to Support Biomarker Testing

Thank you for the opportunity to provide comments on the *Draft Local Coverage Decision (LCD): Molecular Biomarker Testing to Guide Targeted Selection in Rheumatoid Arthritis*. The Global Healthy Living Foundation (GHLF) supports access to biomarker testing for our patient community to facilitate a faster connection between patients and the medications that will best help them.

By way of background, GHLF is a 501(c)(3) non-profit patient group that works to improve the quality of life for people with chronic disease, often focusing on those least able to advocate for themselves. Through our websites, social media channels, and conventional media, GHLF reaches more than 10 million chronically ill people monthly in the United States – in English and Spanish. Our patient community is often forced to try multiple different medications before finding the one that works best for them. Biomarker testing is an important innovative step that can reduce this time and ensure that the most effective medications are in the hands of patients as soon as possible.

Our sickest and most vulnerable members of society rely on the expensive therapies that insurers label “specialty drugs.” The patients that use these types of drugs have incredibly complex disease profiles and often have several comorbidities. Together with their physicians, they select very specific treatment options based on disease progression, disease activity, individual immunogenicity issues, lifestyle preferences (infusion vs. self-injected), and associated out-of-pocket costs. Without biomarker testing, patients are commonly forced to try multiple different treatments or combinations of medications before finding a treatment plan that works best for them. This trial-and-error period often leads to debilitating symptoms and a reduced quality of life while patients suffer ineffective medications. Precision medicine and biomarker testing offers a chance to minimize – or entirely eliminate – those steps and more quickly connect patients to their ultimate goal: finding a successful and sustainable treatment plan.

Evidence shows that these types of tests have been successful in other fields of healthcare, such as cancer, and the CDC itself has a page promoting the benefits of precision medicine. We hope



to see the benefits of precision medicine passed on to our patient community as we look to reduce patient burden and increase the likelihood of successful therapy.

On behalf of those in our community looking for access to innovative tools that will increase their quality of life, we hope that you look favorably at biomarker testing and allow Rheumatoid Arthritis patients to realize its benefits by providing coverage for tests such as PrismRA. Should you need to hear from more patients directly, we are ready to help connect you with those who would stand to benefit from access to this testing.

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