



January 22, 2016

Dear Kansas Committee on Public Health and Welfare,

- The Black Healthcare Coalition opposes SB 341 allowing step therapy on Medicaid through written testimony. The Black Healthcare Coalition serves 1,220 patients in Kansas suffering from diabetes, cardiovascular disease, breast cancer, prostate cancer, hypertension and asthma.
- We believe step therapy is not in the best interest of patients or the health care system because it questions providers' medical judgment and the relationship between health care providers and patients.
- Step therapy is often driven by cost considerations rather than appropriate pharmaceutical and patient care and may involve significant unrecognized risks, as the entire patient medical history may not be available. Further, patients are often required to fail more than once on the same medication.
- We believe that a provider's prescribing decision is the outcome of a careful and deliberate process between the provider and his/her patient, based on his or her judgment of how best to prevent, treat or cure a disease or medical condition. This process requires the evaluation of a specific individual's condition, needs and a variety of scientific data in order to choose the individualized course of therapy that is right for the patient.
- In some cases, step-therapy protocols require patients to use medications for off-label indications. Prescription drug labeling is a summary of the safe and effective uses of a drug, approved by the Food and Drug Administration, intended for healthcare professionals.¹ According to federal regulations, drug labeling must be informative and accurate and may not imply claims or suggestions for use if evidence of safety or effectiveness is lacking.² Patients should not be forced to take a medication for an off-label indication.
- Further, step therapy causes an enormous administrative burden to physicians and medical practices as providers and staff must spend countless hours trying to get approval for the medication that was initially prescribed for a patient based on careful consideration by the provider, but denied at the pharmacy.

¹ ME Kremzer, SF Osborne, "An Introduction to the Improved FDA Prescription Drug Labeling." (<http://www.fda.gov/downloads/Training/ForHealthProfessionals/UCM090796.pdf>)

² 21 C.F.R. § 201.56. Available at: <http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=201.56>.