

October 18, 2017

Eric D. Hargan
Acting Secretary
Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue, SW
Washington, D.C. 20201

Re: MassHealth Section 1115 Demonstration Amendment Request

Dear Acting Secretary Hargan:

The undersigned organizations collectively represent millions of patients who are currently battling or who have fought serious, chronic, and life-threatening diseases. We write to express our opposition to the proposal in the Massachusetts 1115 waiver amendment to potentially limit access to new and innovative drug therapies by imposing a closed formulary with as few as a single drug per therapeutic class in MassHealth, the state's Medicaid program.

Prescription drugs have different indications, different mechanisms of action, and different side effects, depending on the person's diagnosis and comorbidities. Restricting MassHealth's drug benefits to a closed formulary would limit the ability of providers to make the best medical decisions for the care of their patients, effectively taking the clinical care decisions away from the doctor and patient and giving it to the state.

While we appreciate that the state will, when medically necessary, maintain an exceptions process to cover drugs not included on the formulary, the proposal fails to articulate the safeguards that will be put in place to ensure enrollees have access to the prescription drugs they need. Patients suffering from chronic, life-threatening conditions need a guarantee of uninterrupted access to the prescription drugs critical to maintaining or treating their disease. Disruptions in the treatment of serious and chronic conditions, including switching a patients' medication mid-treatment, could negatively impact their treatment and health outcomes.

Medicaid is a crucial source of coverage for thousands of Massachusetts residents with serious and chronic health care needs. This proposed amendment could severely restrict their access to critical therapies necessary to improve health outcomes. Therefore, we strongly urge the Centers for Medicare and Medicaid Services (CMS) to reject Massachusetts' 1115 demonstration amendment request in its current form.

On behalf of the millions of patients we represent, we stand ready to work with you to develop policies that will ensure individuals with serious and chronic conditions maintain access to innovative and medically necessary prescription drugs.

Thank you for your consideration of this important matter.

Sincerely,

American Cancer Society Cancer Action Network
1in9 The Long Island Breast Cancer Action Coalition/Hewlett House
Action CF
ADAP Advocacy Association
Advocates for Responsible Care (ARxC)
AIDS Action Committee of Massachusetts
AIDS Delaware
Alliance for Patient Access
Alpha-1 Foundation
Alzheimer's & Dementia Resource Center
American Academy of Dermatology Association
American Academy of HIV Medicine (AAHIVM)
American Association on Health and Disability
American Autoimmune Related Diseases Association
American Autoimmune Related Diseases Association (AARDA)
American College of Rheumatology
American Foundation for Women's Health / StopAfib.org
American Kidney Fund
American Lung Association
American Medical Association
American Society of Clinical Oncology
Applied Pharmacy Solutions
Areawide Aging Agency, Inc.
Arizona Myeloma Network
Arkansas Rheumatology Association
Arthritis Foundation
Association of Asian Pacific Community Health Organizations (AAPCHO)
Association of Idaho Rheumatologists
BioHouston Inc.
BioNJ
BionorthTX
Bladder Cancer Advocacy Network (BCAN)
Bonnie J. Addario Lung Cancer Foundation
Brain Injury Association of Kansas and Greater Kansas City
Bridge the Gap - SYNGAP1 Education and Research Foundation
California Chronic Care Coalition
California Rheumatology Alliance
Cancer Support Community
Cancer Support Community Central Ohio
Cancer Support Community of Arizona
CancerCare
Caregiver Action Network
Carrie's TOUCH
Center for Health Law and Policy Innovation, Harvard Law School
Center for Healthcare Innovation
Central Florida Behavioral Health Network

Centro de Mi Salud, LLC
CNY HIV Care Network
Coalitions of Texans with Disabilities
Colorado BioScience Association
Colorado Cross-Disability Coalition
Colorado Gerontological Society
Community Access National Network
Community Health Charities of Nebraska
Community Servings, Inc.
Consumers for Quality Care
Cooley's Anemia Foundation
Critical Mass: The Young Adult Cancer Alliance
Dana Farber Cancer Institute at South Shore Medical Center
Delaware Ecumenical Council on Children and Families
Dia de la Mujer Latina, Inc.
Diabetes Patient Advocacy Coalition
Digestive Disease National Coalition
Dysautonomia International
Dyson and Associates, LLC
Easter Seals Massachusetts
Easterseals Central Texas
Ecan.org
EDSers United
EndHepCMA Coalition
Epilepsy Association of Central Florida, Inc.
Epilepsy Association of the Big Bend
Epilepsy Foundation
Epilepsy Foundation Heart of Wisconsin
Epilepsy Foundation New England
Epilepsy Foundation Northwest
Epilepsy Foundation of Alabama
Epilepsy Foundation of Arizona
Epilepsy Foundation of Connecticut
Epilepsy Foundation of Delaware
Epilepsy Foundation of East Tennessee
Epilepsy Foundation of Greater Chicago
Epilepsy Foundation of Oklahoma
Epilepsy Foundation of Vermont
Fight Colorectal Cancer
First Step House
Florida Society of Clinical Oncology
FORCE: Facing Our Risk of Cancer Empowered
Georgia AIDS Coalition
Global Colon Cancer Association
Global Healthy Living Foundation
Global Liver Institute
Haystack Project
HealthCare Institute of New Jersey (HINJ)

Hep C Alliance
Hispanic Health Network
HIV Medicine Association
Hope for Hypothalamic Hamartomas
Hospice and Palliative Care Association of NY State
Hospice and Palliative Nurses Association
ICAN-International Cancer Advocacy Network
IFAA - International Foundation for Autoimmune & Autoinflammatory Arthritis
Immune Deficiency Foundation
International Myeloma Foundation
International Pain Foundation
Iowa State Grange
Kentuckiana Rheumatology Alliance
Kentucky Association of Medical Oncology
Kentucky Life Science Council
Lakeshore Foundation
Latino Commission on AIDS
Long Term Care Community Coalition
Lung Cancer Alliance
LUNgevity Foundation
Lupus And Allied Diseases Association
Lupus Foundation of America
Lupus Foundation of Colorado
Lupus Foundation of Florida
Lupus of Nevada
Massachusetts Gastroenterology Association
Massachusetts Pharmacists Association
Massachusetts Society of Clinical Oncologists
Massachusetts, Maine and New Hampshire Rheumatology Association
MassEquality
Mature Gay Men Aloud
Medical Society of Delaware
Men's Health Network
Mental Health America
Mental Health America of Montana
Mental Health Association in New York State
METAvivor Research and Support
Michigan Osteopathic Association
Mississippi Arthritis and Rheumatology Society
Multiple Sclerosis Foundation
Multiple Sclerosis Resources of CNY, Inc.
NAACP New York State Conference
NAMI Florida
NAMI Greater Des Moines and the Iowa Mental Health Planning Council
NAMI Huntington
NAMI Nevada
NAMI New Mexico
NAMI North Dakota

NAMI of Central Suffolk
NAMI Utah
Nashville CARES
NASTAD
National Alliance on Mental Illness
National Alliance on Mental Illness (NAMI) Texas
National Association of Hepatitis C Task Forces
National Association of Hepatitis Task Forces
National Association of Hispanic Nurses Houston Chapter
National Association of Social Workers - Texas Chapter
National Association of Social Workers, North Carolina Chapter
National Association of Social Workers-MA
National Blood Clot Alliance
National Cervical Cancer Coalition - Arizona
National Coalition for Cancer Survivorship
National Coalition for LGBT Health
National Comprehensive Cancer Network
National Consumers League
National Health Council
National Hemophilia Foundation
National Hispanic Life Sciences Society
National Infusion Center Association (NICA)
National Minority Quality Forum
National Organization for Rare Disorders (NORD)
National Osteoporosis Foundation
National Patient Advocate Foundation
National Viral Hepatitis Roundtable
Neuropathy Action Foundation
New England Chapter American Association of Clinical Endocrinologists
New Jersey Association of Mental Health and Addiction Agencies, Inc.
NJ Mayors Committee on Life Sciences
NMBio
Ohio Association of Rheumatology
Ohio Hematology Oncology Society
Oregon Rheumatology Alliance
Ovarian Cancer Research Fund Alliance
Partnership to Improve Patient Care
Prevent Blindness Children's Vision Massachusetts
Project Inform
Psychosocial Rehabilitation Association of New Mexico
RAIN Oklahoma
Rare Disease United Foundation
Relapsing Polychondritis Awareness and Support Foundation Inc.
Rheumatology Alliance of Louisiana
Rheumatology and Internal Medicine Associates, PC
Rheumatology Association of Iowa
Rio Grande Valley Diabetes Association
Rio Grande Valley Partnership

Rocky Mountain Stroke Center
Rush To Live
SAGE Utah
Scleroderma Foundation-Rocky Mountain Chapter
Sickle Cell Disease Association of Florida
South Carolina Rheumatism Society
South Cove Community Health Center
Southeastern Wisconsin Oncology Nursing Society
SURVIVEIT®
Survivors Cancer Action Network/Alabama
Susan G. Komen
Tennessee Rheumatology Society
Texas Healthcare and Bioscience Institute
Texas Life Sciences Collaboration Center
Texas Renal Coalition
TexHealth
The AIDS Institute
The Epilepsy Foundation of Greater Southern Illinois
The Leukemia & Lymphoma Society
The Myositis Association
The National Adrenal Diseases Foundation
The Ohio Council of Behavioral Health & Family Services Providers
The Turnpike Partnership
Tuberous Sclerosis Alliance
U.S. Rural Health Network
United Ostomy Associations of America
United Partners for Human Services
US Pain Foundation
UsAgainstAlzheimers
Utah Pride Center
Wisconsin Rheumatology Association
Women In Progress Inc.
ZERO - The End of Prostate Cancer