



August 21, 2012

Commissioner Sharon P. Clark  
Department of Insurance  
P.O. Box 517  
Frankfort, Kentucky 40602-0517

**RE: Comments on Essential Health Benefit Benchmark Plan Selection**

Dear Commissioner Clark,

The National Hemophilia Foundation (NHF) and Kentucky Hemophilia Foundation (KHF) appreciate the opportunity to provide comments on Kentucky's essential health benefits (EHB) benchmark plan and benefit options. NHF is the nation's leading advocacy organization working to ensure that individuals affected by hemophilia and related bleeding disorders have timely access to high quality medical care and services, regardless of financial circumstances or place of residence. The KHF is dedicated to improving the quality of life for Kentuckians with bleeding disorders.

Hemophilia and related bleeding disorders are rare, complex genetic conditions for which there are no known cures. Individuals often experience spontaneous and prolonged internal bleeding in the joints and tissues. To effectively manage these disorders, patients often require life-long infusions of clotting factor therapies that replace the missing or deficient blood proteins, thus preventing debilitating and life threatening internal bleeding. While therapies are safer and more effective than ever, they are also more costly than other types of medication. For example, cost of treatment for a person with severe hemophilia can be \$250,000 a year or more. Developing an inhibitor (i.e., an immune response to treatment), complications such as HIV/AIDS, hepatitis and joint diseases, or bleeding as a result of trauma or surgery can increase those costs to over \$1 million.

We are very pleased that the Department of Insurance (DOI) is working to define EHB and determine a suitable benchmark plan. Given the complex nature of these conditions, it is imperative whichever plan is chosen as the benchmark (i.e., small group, state, or federal employee), that plan must adequately address the unique healthcare needs of those with bleeding disorders. Specifically, plans should guarantee the following:

**1. Access to specialists at federally recognized hemophilia treatment centers (HTCs)**

Since 1974, Congress has authorized and funded a national network of HTCs to provide comprehensive, specialized care for individuals with hemophilia and other bleeding disorders. These centers are staffed with healthcare professionals across multiple disciplines including hematologists, physical therapists, nurses, dentists and social workers that work as a team to provide coordinated care for this complex patient population. In addition to disease and case management, HTCs monitor blood safety and offer many educational programs for individuals and their families.



Numerous U.S. Centers for Disease Control and Prevention (CDC) studies show that individuals receiving comprehensive care at HTC have a 40 percent reduction in morbidity and mortality, despite the fact that more severe patients are seen at an HTC. Moreover, studies show that patients who use HTCs experience fewer long-term complications and hospitalizations, increasing quality of life and reducing total healthcare care costs over a patient's lifetime.<sup>1,2</sup>

**The ACA specifies that entities covered under section 340B(a)(4) of the Public Health Service Act (which *includes* federally recognized HTCs) be designated as essential community providers. This designation helps ensure that HTCs are included in qualified health plans (QHP) and that individuals have access to these specialized healthcare providers (i.e., physical therapist, hematologist, social worker, etc.), laboratory and pharmacy services. We encourage the State to require plans to permit access to state-based and/or regional HTCs.**

## **2. Access to the full range of FDA approved clotting factor products**

Clotting factor therapies are biological products (derived from human blood plasma or using recombinant technology). There are no generic equivalents. Moreover, because of the nature of bleeding disorders, an individual's response and tolerability for a specific product is unique. For these reasons, NHF's Medical and Scientific Advisory Council (MASAC) recommends that individuals have access to the full range of FDA approved clotting factor products.<sup>3</sup> Limiting access through the use of restrictive drug formularies, such as requiring prior authorization and preferred drug lists, will negatively impact patient care. Therefore, drug benefit designs employing these methods should be avoided and which product an individual uses should be a decision between patient and physician.<sup>4</sup>

## **3. Access to a range of specialty pharmacy providers**

Unlike other types of medication typically bought at a retail pharmacy, clotting factor therapies require special handling, shipping and refrigeration. Additionally, patients often require other products (i.e., syringes, saline), nursing services, and intensive education to manage their complex health condition. These requirements are beyond the ability of a traditional retail pharmacy and are only available through specialty pharmacy providers.

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<sup>1</sup> Soucie JM et al. Mortality among males with hemophilia: relations with source of medical care. *Blood* 2000; 96:437-442.

<sup>2</sup> Soucie JM et al. Home-based factor infusion therapy and hospitalization for bleeding complications among males with hemophilia. *Haemophilia* 2001; 7:198-206.

<sup>3</sup> MASAC Document #132. (2002). Standards and Criteria for the Care of Persons with Congenital Bleeding Disorders. [www.hemophilia.org](http://www.hemophilia.org).

<sup>4</sup> MASAC Document #159. (2005). Recommendation Regarding Factor Concentrate Prescriptions and Formulary Development and Restrictions. [www.hemophilia.org](http://www.hemophilia.org).



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[www.hemophilia.org](http://www.hemophilia.org)

These providers are specially trained to handle the unique needs of the bleeding disorder community and are expected to adhere to the standards outlined by MASAC.<sup>5</sup> Considering the variability of patient needs and provider services, patients need access to a network of pharmacy providers to properly manage their conditions and live longer, healthier lives. We would also encourage that the agency incorporate provider standards for pharmacies that dispense clotting products.

Sincerely,

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National Hemophilia Foundation

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<sup>5</sup> MASAC Document #188. (2008). Recommendation Regarding Standards of Service for Pharmacy Providers of Clotting Factor Concentrates for Home Use to Patients with Bleeding Disorders. [www.hemophilia.org](http://www.hemophilia.org).