



# NATIONAL HEMOPHILIA FOUNDATION

www.hemophilia.org

August 1, 2014

Ms. Rhonda Driver, R.Ph.  
Director of Pharmacy  
MO HealthNet Division  
State of Missouri, Department of Social Services

## **RE: Missouri Medicaid Reimbursement Rates for Clotting Factor**

Dear Ms. Driver,

The National Hemophilia Foundation (NHF) advocates on behalf of individuals with hemophilia and related bleeding disorders, leading the nationwide fight to ensure access to affordable medical care and services. We are writing to express concerns with regards to changes in Medicaid reimbursement for clotting factor products – the medications used to treat and control bleeding in individuals with bleeding disorders. The reimbursement rates posted for July 2014 indicate a significant decrease in rates from the previous month. It is imperative that Missouri's Department of Social Services act immediately to prevent potentially devastating access to care challenges for recipients of Medicaid who are living with bleeding disorders.

Hemophilia and other bleeding disorders occur when a person is deficient in or lacks one of several proteins necessary for the blood to clot. Many individuals experience spontaneous internal bleeding that can result in severely damaged joints, or sometimes death. Treatment entails the infusion of clotting factor (derived either from human plasma or manufactured through recombinant technology) to compensate for missing or defective blood proteins. Therefore, access to the full range of approved clotting factor products, and also to a sufficient number and type of pharmacy providers is vital to the well-being of those with bleeding disorders.

Missouri Medicaid's recent lowering of reimbursement rates for clotting factor may threaten access to treatment for members of our community in a way that is potentially devastating. When specialty pharmacies and/or 340Bs are not adequately reimbursed, we risk the following circumstances:

- 1) A sole source<sup>1</sup> provider market for clotting factor due to low rates that serve as a barrier to entry;
- 2) No access to clotting factor for affected individuals insured by Medicaid.

NHF deems each circumstance undesirable and against recommendations set forth by the Medical and Scientific Advisory Council (MASAC), the leading council of medical experts on treatment of individuals with hemophilia and related bleeding disorders. *MASAC's Recommendation Concerning Reimbursement*

---

<sup>1</sup> You can find NHF's position paper on sole source provider [here](#).



## NATIONAL HEMOPHILIA FOUNDATION

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

for Recombinant Clotting Factor Concentrates (MASAC 188) speaks to the need for pharmacy providers to “provide the full range of available concentrates” of clotting factor, as well as the necessity for access to the specific method of treatment as “prescribed by the patient’s treating physician”.<sup>2</sup> However, in case of the aforementioned sole source provider market, members of our community may be denied access to the full range of FDA-approved products. A competitive market ensures access to timely and adequate treatment while also maximizing product safety. The second circumstance under which Missouri Medicaid patients would have no access to clotting factor is completely unacceptable, against MASAC recommendations, and potentially deadly for members of the bleeding disorders community. The reality is that specialty pharmacies and/or 340Bs may simply not be able to provide their services when the reimbursement rate does not sufficiently cover their expenses.

To maximize access to care for individuals with hemophilia and related bleeding disorders, we urge Missouri Medicaid to consider the following unique circumstances that impact the cost of dispensing clotting factor:

- While NHF does not make pricing recommendations, we do assert that the cost of expenses for specialty pharmacies and 340Bs should be a factor when setting reimbursement rates for clotting factor.
- Furthermore, the dispensing fee for clotting factor is often different than most other conditions. Please take into consideration the following services needed by our patients – the cause for potentially higher dispensing fees:
  - Special Shipping and Handling (i.e. refrigerated shipping)
  - Storage Requirements
  - Ancillary Supplies (i.e. needles/syringes, sharps disposal containers)

NHF values patient care above all. We advocate for adequate access to care (as specified by MASAC) for members of the bleeding disorders community; this entails access to the full range of FDA approved clotting factor, and to a sufficient number and type of pharmacy providers. **While NHF realizes that Missouri Medicaid seeks to reduce costs, the current reimbursement practices for clotting factor threaten this access.** Thank you for the opportunity to share our concerns. If you have any questions or require additional information, please do not hesitate to contact Michelle Rice at [mrice@hemophilia.org](mailto:mrice@hemophilia.org).

Sincerely,

Michelle Rice

Vice President, Public Policy and Industry Relations  
National Hemophilia Foundation

---

<sup>2</sup> “MASAC Document #188: MASAC Recommendations Regarding Standards of Service for Pharmacy Providers of Clotting Factor Concentrates for Home Use to Patients with Bleeding Disorders.” *The National Hemophilia Foundation*. 16 November 2008. You can access MASAC #188 [here](#).