



Our Mission: To drive efforts to cure psoriatic disease and improve the lives of those affected.

August 30th, 2019

Department of Consumer and Business Services
Division of Financial Regulations
350 Winter Street NE
Salem, OR 97309-0405

RE: Rule Making for Prior Authorization Requirements for Health Benefit Plans and Prior Authorization Trade Practices for Health Insurance other than Health Benefit Plans.

Dear Department of Consumer and Business Services,

The National Psoriasis Foundation (NPF) appreciates the opportunity to submit comments on Oregon's proposed rules for prior authorization requirements for health benefit plans and other health insurance. The NPF is a non-profit organization with a mission to drive efforts to cure psoriatic disease and improve the lives of those affected. The NPF is the leading patient advocacy group for more than eight million Americans and roughly 105,731 Oregon residents living with psoriasis and psoriatic arthritis.

We have reviewed the proposed rules for prior authorization, NPF formally submits this letter for the Department of Consumer and Business Service's consideration as our public comment in support of a policy that will give patients more transparency and efficiency when utilizing their benefits and requesting appropriate treatment options.

NPF recognizes the importance of access to care. Patients with psoriatic disease are at a heightened risk to develop other chronic conditions, including cardiovascular disease and stroke, diabetes and hypertension, as well as depression and anxiety¹. Given the uncertain nature of psoriatic disease and varying responses to treatment from our patients, it is critical our patient community have a clear, timely, and efficient process to accessing the most appropriate therapy for them and their disease.

We support Oregon's proposed revision to include a standard timeline for prior authorization requests and extend this to trade practices of health plans regulated by the department. Restrictions and delays in care due to utilization management can lead to worse health outcomes for patients living with psoriatic disease, which ultimately can exacerbate a patient's condition.² An Institute for Clinical and Economic Review (ICER) report on treatment for moderate-to-severe plaque psoriasis cautions against barriers to accessing treatments, including those kinds of utilization management protocols.³ Ensuring a determination within two business days of request including a frame work for additional information, and ultimately a approval or denial of request within fifteen days after the date of request will help alleviate delays in care. This new

¹ Journal of American Academy of Dermatology: Joint AAD-NPF guidelines of care for the management and treatment of psoriasis with biologics - April 2019 Volume 80, Issue 4, pages 1029–1072

² <https://oig.hhs.gov/oei/reports/oei-09-16-00410.pdf>

³ Institute for Clinical and Economic Review: Targeted Immunomodulators for the Treatment of Moderate-to-Severe Plaque Psoriasis: Effectiveness and Value - August 03, 2018

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process will better serve patients and create a process that works for all stakeholders. For the psoriatic disease community this means higher treatment efficacy and a reduction in adverse reactions.

We encourage efforts to extend prior authorization standards in trade practices for all health plans regulated through the department. With recent federal rules that expand association health plans (AHP) and short-term, limited-duration (STLD) health plans to the market, these plans do not have to adhere to the regular market standards including patient protections under the Patient Protection and Affordable Care Act. We applaud the department for wanting to place a standard across all state regulated healthcare plans to ensure better access to care for patients.

Looking ahead, we encourage Oregon regulators to monitor the impact and adherence of the rule to ensure that it continues to yield improved access for marketplace consumers. We also encourage Oregon regulators, when enhancing rules around utilization management policies, to continue to have a patient-centered focus and alignment with clinical practice standards. We welcome a meeting to discuss our newly published guidelines outlining best practices for managing psoriatic disease to help inform your review of clinical practice standards and benefits for plans regulated through the department.

We look forward to the adoption of the proposed rules and appreciate your consideration of our comments. If you have any questions about our remarks, please contact Brittany Duffy-Goche with the National Psoriasis Foundation at bduffy-goche@psoriasis.org or 503-546-8364.