

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  
Diabetes Patient Advocacy Coalition  
National Blood Clot Alliance  
Global Colon Cancer Association  
US Pain Foundation  
CancerCare  
National Health Council  
American Autoimmune Related Diseases Association  
Lupus Foundation of America  
Ecan.org  
Multiple Sclerosis Foundation  
Cooley's Anemia Foundation  
Epilepsy Foundation  
Tuberous Sclerosis Alliance  
Fight Colorectal Cancer  
Epilepsy Foundation New England  
Arthritis Foundation  
Digestive Disease National Coalition  
The AIDS Institute  
National Consumers League  
Center for Health Law and Policy Innovation, Harvard Law School  
Mental Health America  
National Viral Hepatitis Roundtable  
National Organization for Rare Disorders (NORD)  
Lung Cancer Alliance  
ADAP Advocacy Association  
Community Access National Network  
Bladder Cancer Advocacy Network (BCAN)  
Georgia AIDS Coalition  
National Comprehensive Cancer Network  
Hispanic Health Network  
Latino Commission on AIDS  
Hep C Alliance  
NASTAD  
Global Healthy Living Foundation  
Association of Asian Pacific Community Health Organizations (AAPCHO)  
Immune Deficiency Foundation  
Project Inform  
Hospice and Palliative Nurses Association  
National Patient Advocate Foundation  
American Lung Association  
Hope for Hypothalamic Hamartomas  
National Alliance on Mental Illness  
Ovarian Cancer Research Fund Alliance  
Community Servings, Inc.  
International Pain Foundation

Rare Disease United Foundation  
American Medical Association  
South Cove Community Health Center  
International Myeloma Foundation  
American Academy of HIV Medicine (AAHIVM)  
Rush To Live  
National Minority Quality Forum  
Community Health Charities of Nebraska  
Global Liver Institute  
Caregiver Action Network  
Southeastern Wisconsin Oncology Nursing Society  
Central Florida Behavioral Health Network  
Epilepsy Association of the Big Bend  
Areawide Aging Agency, Inc.  
Epilepsy Association of Central Florida, Inc.  
United Partners for Human Services  
NAMI Florida  
NAMI Greater Des Moines and the Iowa Mental Health Planning Council  
RAIN Oklahoma  
Brain Injury Association of Kansas and Greater Kansas City  
Cancer Support Community Central Ohio  
Center for Healthcare Innovation  
Iowa State Grange  
Alzheimer's & Dementia Resource Center  
Dana Farber Cancer Institute at South Shore Medical Center  
American Autoimmune Related Diseases Association (AARDA)  
Relapsing Polychondritis Awareness and Support Foundation Inc.  
FORCE: Facing Our Risk of Cancer Empowered  
Lupus Foundation of Florida  
The Myositis Association  
Cancer Support Community of Arizona  
Lupus And Allied Diseases Association  
Dysautonomia International  
National Hispanic Life Sciences Society  
Rheumatology Association of Iowa  
AIDS Action Committee of Massachusetts  
Mental Health America of Montana  
Critical Mass: The Young Adult Cancer Alliance  
U.S. Rural Health Network  
National Hemophilia Foundation  
Massachusetts Pharmacists Association  
IFAA - International Foundation for Autoimmune & Autoinflammatory Arthritis  
Epilepsy Foundation Heart of Wisconsin  
EndHepCMA Coalition  
Epilepsy Foundation of Alabama  
Epilepsy Foundation of Connecticut  
Arizona Myeloma Network

Epilepsy Foundation of Arizona  
Epilepsy Foundation of Greater Chicago  
ZERO - The End of Prostate Cancer  
Easter Seals Massachusetts  
The Epilepsy Foundation of Greater Southern Illinois  
United Ostomy Associations of America  
Epilepsy Foundation of East Tennessee  
Sickle Cell Disease Association of Florida  
Bridge the Gap - SYNGAP1 Education and Research Foundation  
Epilepsy Foundation Northwest  
Coalitions of Texans with Disabilities  
Mental Health Association in New York State  
The Ohio Council of Behavioral Health & Family Services Providers  
American Association on Health and Disability  
Lakeshore Foundation  
Lupus Foundation of Colorado  
TexHealth  
Colorado Gerontological Society  
Massachusetts Gastroenterology Association  
1in9 The Long Island Breast Cancer Action Coalition/Hewlett House  
EDSers United  
Colorado Cross-Disability Coalition  
Survivors Cancer Action Network/Alabama  
Long Term Care Community Coalition  
AIDS Delaware  
Hospice and Palliative Care Association of NY State  
LUNgevity Foundation  
Ohio Hematology Oncology Society  
Kentucky Association of Medical Oncology  
NAMI of Central Suffolk  
National Association of Hispanic Nurses Houston Chapter  
Multiple Sclerosis Resources of CNY, Inc.  
Alpha-1 Foundation  
Advocates for Responsible Care ( ARxC )  
Consumers for Quality Care  
Epilepsy Foundation of Oklahoma  
NAMI North Dakota  
Epilepsy Foundation of Vermont  
American Society of Clinical Oncology  
Texas Healthcare and Bioscience Institute  
Massachusetts Society of Clinical Oncologists  
Scleroderma Foundation-Rocky Mountain Chapter  
Susan G. Komen  
Women In Progress Inc.  
Cancer Support Community  
HIV Medicine Association  
BionorthTX  
Rio Grande Valley Partnership

Texas Renal Coalition  
Epilepsy Foundation of Delaware  
SAGE Utah  
Mature Gay Men Aloud  
Utah Pride Center  
Easterseals Central Texas  
Dia de la Mujer Latina, Inc.  
Centro de Mi Salud, LLC  
Michigan Osteopathic Association  
Rio Grande Valley Diabetes Association  
National Alliance on Mental Illness (NAMI) Texas  
Massachusetts, Maine and New Hampshire Rheumatology Association  
National Association of Social Workers - Texas Chapter  
American College of Rheumatology  
First Step House  
Arkansas Rheumatology Association  
Florida Society of Clinical Oncology  
NAACP New York State Conference  
Bonnie J. Addario Lung Cancer Foundation  
Texas Life Sciences Collaboration Center  
South Carolina Rheumatism Society  
Association of Idaho Rheumatologists  
American Foundation for Women's Health / StopAfib.org  
Rheumatology and Internal Medicine Associates, PC  
Oregon Rheumatology Alliance  
BioHouston Inc.  
National Osteoporosis Foundation  
The Leukemia & Lymphoma Society  
Lupus of Nevada  
Ohio Association of Rheumatology  
NJ Mayors Committee on Life Sciences  
Delaware Ecumenical Council on Children and Families  
The National Adrenal Diseases Foundation  
NAMI Nevada  
ICAN-International Cancer Advocacy Network  
Applied Pharmacy Solutions  
BioNJ  
Kentucky Life Science Council  
Prevent Blindness Children's Vision Massachusetts  
The Turnpike Partnership  
Partnership to Improve Patient Care  
National Association of Social Workers, North Carolina Chapter  
Medical Society of Delaware  
NAMI Huntington  
New Jersey Association of Mental Health and Addiction Agencies, Inc.  
Men's Health Network  
HealthCare Institute of New Jersey (HINJ)  
Neuropathy Action Foundation

CNY HIV Care Network  
Kentuckiana Rheumatology Alliance  
American Kidney Fund  
National Cervical Cancer Coalition - Arizona  
Colorado BioScience Association  
NMBio  
Nashville CARES  
National Association of Social Workers-MA  
Tennessee Rheumatology Society  
National Association of Hepatitis Task Forces  
National Association of Hepatitis C Task Forces  
National Coalition for LGBT Health  
Rocky Mountain Stroke Center  
National Infusion Center Association (NICA)  
Wisconsin Rheumatology Association  
Mississippi Arthritis and Rheumatology Society  
California Rheumatology Alliance  
National Coalition for Cancer Survivorship  
NAMI New Mexico  
NAMI Utah  
Psychosocial Rehabilitation Association of New Mexico  
SURVIVEit®  
Alliance for Patient Access  
METAvivor Research and Support  
MassEquality  
California Chronic Care Coalition  
Carrie's TOUCH  
Dyson and Associates, LLC  
New England Chapter American Association of Clinical Endocrinologists  
Rheumatology Alliance of Louisiana  
American Academy of Dermatology Association  
Action CF  
UsAgainstAlzheimers  
Haystack Project