December 19, 2024

Kenneth Kennedy, PharmD, MS, BCOP Medical Drug Strategies Lead Humana, Inc. 101 E. Main St. Louisville, KY 40202

Mary Hayes, PharmD, BCPS
Director of HPS Clinical Formulary & Medical Drug Strategies
Humana, Inc.
101 E. Main St.
Louisville, KY 40202

Dear Dr. Kennedy and Dr. Hayes,

The undersigned organizations representing cancer patients and caregivers urge you to reconsider Humana's recently announced medical coverage policy change for PD-1/PD-L1 non-small cell lung cancer (NSCLC) in Medicare Advantage (MA) plans starting January 1, 2025. The policy change proposed by Humana is significantly more restrictive than the National Comprehensive Cancer Network (NCCN) guidelines for treatment of NSCLC. We are very concerned that this policy will limit treatment options for patients diagnosed with metastatic PD-1/PD-L1 NSCLC and lead to harmful and unnecessary delays in care.

In a statement issued on November 6 of this year, Humana indicated that it would apply a step strategy to frontline metastatic NSCLC with a requirement to use the preferred product, cemiplimab-rwlc. Under this policy change, if a physician has recommended a different immunotherapy (IO) or combination IO in consultation with their patient, that patient would have to "fail" on the preferred product before receiving coverage for the recommended treatment – or go through an onerous medical exception process that will inevitably lead to harmful delays in care. We are particularly concerned that this policy contradicts standard practice of care, undermines physician expertise, and will prevent or delay access to life-saving and life-preserving combination IO treatments for those patients whose specific status would suggest this option. This policy undermines the ability of physicians and patients to make treatment decisions tailored to each patient's unique medical needs and desired outcomes.

According to the current NCCN Guidelines, there is no recommendation to go to an IO or IO combination in second line after treatment with an IO in first line. Please see NCCN Guidelines Version 11.2024-October 15, 2024, Non-Small Cell Lung Cancer Section NSCL-J; pages 2 of 6, and 3 of 6<sup>1</sup>. The "Preferred" and "Other Recommended" NCCN categories should not be misconstrued as the basis for step therapy, as both NCCN categories remain recommended treatments by NCCN.

<sup>&</sup>lt;sup>1</sup> NCCN Clinical Practice Guidelines in Oncology (NCCN Guidelines®) for Non-Small Cell Lung Cancer V.11.2024, NSLC-J page 2 of 6. © National Comprehensive Cancer Network, Inc. 2024. All rights reserved. Accessed December 11, 2024. To view the most recent and complete version of the guideline, go online to NCCN.org.

For patients, it is vital that payers, including MA and MA-PD plans, include all available medically necessary treatment options in their formularies, without imposing step therapy protocols, so that physicians and patients are able to make treatment decisions based on disease characteristics and what will enable the patient to achieve a durable treatment response while maintaining their quality of life.

Our organizations strongly urge Humana to immediately reverse their planned January 1, 2025 policy change and instead adopt a more patient-centered approach. Please consider our organizations a resource because we work with patients impacted by NSCLC and can share insights related to treatment preferences, outcomes, and needs. If you have any questions, please contact Brandon Leonard, Senior Director of Government Affairs at LUNGevity Foundation, at <a href="mailto:bleonard@lungevity.org">bleonard@lungevity.org</a>.

Going forward, we ask Humana to ensure that your utilization management techniques align with clinical practice guidelines and prioritize shared decision-making between patients and providers to ensure the best possible outcomes.

Sincerely,

Aimed Alliance

American Lung Cancer Screening Initiative

Biomarker Collaborative

**BRAF Bombers** 

**Cancer Support Community** 

Caregiver Action Network

Caring Ambassadors Program

Citizens for Radioactive Radon Reduction Inc.

Clifton F. Mountain Foundation for Education & Research in Lung Cancer

**EGFR Resisters** 

Exon 20 Group

Free ME from Lung Cancer

GO2 for Lung Cancer

ICAN, International Cancer Advocacy Network

KRAS Cancer Connect | KRAS Kickers

LiveLung

**Lung Cancer Connection** 

Lung Cancer Foundation of America

Lung Cancer Initiative

Lung Cancer Research Foundation

**LUNGevity Foundation** 

**MET Crusaders** 

National Coalition for Cancer Survivorship

PD-L1 Amplifieds

RetireSafe

School Radon Safety

The White Ribbon Project

**Upstage Lung Cancer**