

**Gary R. Feldman, MD, FACR**  
President

March 1, 2023

**Madelaine A. Feldman, MD, FACR**  
VP, Advocacy & Government Affairs

Health and Government Operation Committee  
100 State Cir  
Annapolis, Maryland 21401

**Michael Saitta, MD, MBA**  
Treasurer

**Aaron Broadwell, MD**  
Secretary

**Re: Support for HB 785**

**Erin Arnold, MD**  
Director

The Coalition of State Rheumatology Organizations (CSRO) is a national organization composed of over 30 state and regional professional rheumatology societies, including our member society that represents providers of rheumatology care in Maryland. CSRO was formed by physicians to ensure excellence and access to the highest quality care for patients with rheumatologic, autoimmune, and musculoskeletal disease. It is with this in mind that we write to you in support of HB 785.

**Leyka M. Barbosa, MD, FACR**  
Director

**Kostas Botsoglou, MD**  
Director

**As you consider HB 785, CSRO would like to convey its support for reforming the use of step-therapy protocols.**

**Michael S. Brooks, MD, FACP, FACR**  
Director

**Amish J. Dave, MD, MPH**  
Director

The implementation of step-therapy protocols without transparent, streamlined, and consistent exceptions pathways available to physicians has had serious consequences for patients. CSRO recognizes that there can be a role for utilization management, but when utilization controls have become so stringent that they interfere with patients receiving therapies in their best interest, the balance is decidedly uneven.

**Harry Gewanter, MD, FAAP, MACR**  
Director

**Adrienne R. Hollander, MD**  
Director

**Firas Kassab, MD, FACR**  
Director

Rheumatologists treat patients with extremely complex chronic conditions such as rheumatoid arthritis (RA). Complex chronic conditions such as RA are temperamental and present unpredictably on a case-by-case basis. This necessitates a high degree of individualized care and attentive management. Stabilizing these conditions is a process that can take months or even years of trial and error. The resulting course of treatment must carefully balance each patient's unique medical history, disease environment, and drug interactions. Step-therapy protocols are a one-size fits all approach that hampers treatment decisions arrived at through the course of the doctor-patient relationship. Existing appeals pathways have failed to rectify these problems.

**Robert W. Levin, MD**  
Director

**Amar Majjhoo, MD**  
Director

**Gregory W. Niemer, MD**  
Director

**Joshua Stolow, MD**  
Director

HEADQUARTER OFFICE

**Ann Marie Moss**  
Executive Director

Step-therapy protocols may provide reasonable guidelines for broad populations, but patients with complex chronic conditions require a different approach. There must be a role for the doctor-patient relationship, and there must be clear and transparent scenarios.

The stakes for these patients are high. Variations between drugs, even those in the same therapeutic class, can cause serious adverse events. The resulting disease progression can be irreversible, life threatening, and result in increased utilization of healthcare resources.

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Although Maryland previously enacted select reforms to the use of step therapy protocols, it has become clear that additional protections are needed to keep up with evolving treatment needs.

**HB 785 does not prohibit insurers from using step therapy, but seeks to balance cost containment with patient needs.**

More specifically, it protects patients by:

- (1) Ensuring that the exceptions process for step therapy is explicit, transparent, and accessible to patients and health care providers;
- (2) Establishing a basic framework that enables physicians to override step therapy protocols where it is medically necessary.
- (3) Streamlines the process for requesting an exception, including requiring consistent and expedient determination timelines.

For these reasons CSRO urges you to support HB 785

We appreciate your consideration of our comments.

Respectfully,



Gary Feldman, MD, FACR  
President, CSRO



Madelaine Feldman, MD, FACR  
Vice President Advocacy & Government Affairs, CSRO