



November 11, 2024

Priya Shah, Pharm D
West Virginia Department of Human Services
Drug Utilization Review Board
350 Capitol Street
Charleston, WV 25301

RE: Step Therapy Protocols for Mental Health Treatments

Dear Members of the Drug Utilization Review Board:

On behalf of the Alliance for Patient Access (AfPA) I am writing to encourage review of your step therapy requirements for mental health treatments. We are concerned these restrictions are overly burdensome and inappropriately limit access to the full range of antidepressant medications. AfPA urges you to revise these policies to improve the quality of care for patients living with mental health conditions in West Virginia.

Founded in 2006, AfPA is a national network of policy-minded health care providers who advocate for patient-centered care. AfPA supports health policies that reinforce clinical decision-making, promote personalized care and protect the provider-patient relationship. Motivated by these principles, AfPA members participate in clinician working groups, advocacy initiatives, stakeholder coalitions and the creation of educational materials. AfPA's Mental Health Working Group focuses on ensuring policies are in place that allow for patient-centered care for those living with mental health conditions.

It has come to our attention that there are significant differences in the coverage policies for a variety of antidepressant treatments. Patients in West Virginia Medicaid plans are required to complete an onerous step therapy process prior to accessing non-preferred therapies their health care providers seek to prescribe. In addition, prior to accessing dextromethorphan-bupropion combination medicine (known as Auvelity) patients must step through no less than seven treatments, as well as the individual components of dextromethorphan and bupropion.

We are concerned that West Virginia Medicaid's restrictions are inappropriately hindering access to effective, FDA-approved treatments for patients living with mental health conditions. This policy places an unnecessary burden on clinicians and patients. Requiring patients to work through multiple steps, as well as individual components, for drugs in the antidepressant class can have significant negative effects on their well-being. In addition, step therapy can lead to treatment abandonment due to failure, paperwork requirements, the possible need for multiple medical visits to evaluate patient health, and delays in care. Adherence is particularly important for patients living with mental health conditions.

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Patients with mental health conditions are often disproportionately disadvantaged by other factors including low household income, residential instability, and poor physical health.¹ By not allowing exceptions due to adverse events, patients may face worse health outcomes. For mental health patients this can have devastating consequences for themselves, their families and society at large.

Providers should be able to work with their patients to determine the treatment option they determine best meets the patient's needs and will lead to the highest level of adherence. Once established, they should have uninterrupted access to these treatments. **We urge you to take a patient-centered approach by providing access to the full range of therapies, allowing clinicians and patients to choose based on clinician expertise.**

Patient-centric care is built upon a foundation of trust between the patient and his or her health care provider. Only through open discussion and shared decision making can this relationship effectively develop to provide the patient with the most appropriate care. When health care plans undermine this clinician-patient partnership by interfering with the agreed upon course of treatment, it jeopardizes the patient's well-being. Accordingly, we urge you to revise your current step therapy processes to reduce the barriers between patients and appropriate therapies.

Thank you for the opportunity to provide comment and we appreciate your attention to this matter. If AfPA can provide further details or be of assistance, please contact us at 202-951-7097.

Sincerely,

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¹ <https://jamanetwork.com/journals/jamapsychiatry/fullarticle/2767721>