

We, the undersigned organizations, respectfully ask you to reconsider the recent policy change regarding prior authorizations and site of care restrictions for IL-5/IL-5Ra agents. This policy should be amended to allow clinicians and patients the opportunity to determine how best to ensure continued access in the most appropriate setting to these essential medications.

The proposed policy states, in office administration of mepolizumab (Nucala) and benralizumab (Fasenra) “requires that the patient has a physical or cognitive limitation that makes the utilization of self-administration formulation unsafe or otherwise not feasible.” The policy then sets forth two specific criteria that satisfies the above:

1. *Inability to self-administer the medication; AND*
2. *Lack of caregiver or support system for assistance with administration of self-administered products.*

Patients living with severe asthma and the prescribing physician should make the choice together on whether administration of their biologic should be given at home or in the physician’s office. Some patients may simply not be comfortable with self-injection or home administration. Why should they be subject to this potential delay in treatment?

While we understand the COVID-19 pandemic may have an impact on this risk analysis, the narrow confines of the proposed policy strips both physician and patient of a vitally important shared decision-making process. Furthermore, most offices have implemented stringent infection control policies to ensure patients receiving these essential medications in office may do so in the safest manner possible.

Finally, the expedited timetable for implementation of this policy places these vulnerable patients at greater risk for missed doses. Changes in authorizations, identifying new specialty pharmacies, and ensuring timely shipment of medication is always challenging and is likely to be more so during this unprecedented healthcare crisis. Mandating such a significant change on a rapid timeline in the midst of a global pandemic will undoubtedly place severe asthma patients at risk.

