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Coalition of State Rheumatology Organizations

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October 27, 2017

Michigan House Health Policy Committee
House of Representatives
P.O. Box 30014
Lansing, MI 48909-7514

Re: Support for the Proposed Substitute for House Bill No. 4472

Dear Members of the House Health Policy Committee,

The Coalition of State Rheumatology Organizations is a national organization composed of over 40 state and regional professional rheumatology societies formed in order to advocate for excellence in rheumatologic care and to ensure access to the highest quality care for patients with rheumatologic and musculoskeletal disease. Rheumatologists are entrusted with the safe care of patients with rheumatoid arthritis and other autoimmune diseases that require the careful choice of safe and effective pharmaceutical and biological therapies.

As you consider HB 4472, CSRO wishes to convey its support. Importantly, the bill requires that: a pharmacist substituting an interchangeable biological product must, "within five days after dispensing…communicate to the prescriber the specific…product provided to the patient, including the name… and its manufacturer."

Biosimilar products, even those deemed interchangeable by the FDA, do not have the same active chemical ingredients as their reference products, presenting the potential for adverse consequences on a patient-by-patient basis that necessitates quick intervention by prescribers. Timely substitution communications for prescribing physicians are essential to ensure patient safety with these uniquely innovative, but uniquely challenging products. We support the agreed upon timeframe for the communication to occur within 5 days of the substitution. This specific time period offers physicians a safer and more consistent window to understand and counter any adverse effects of medications.

Physicians must be involved in decisions regarding their patient's use of a biosimilar. Allowing health systems to impose an automatic substitution for biologics, without informing the prescribing physician of the product dispensed, makes it harder to determine which product is responsible for adverse events and may not be safe for patients.

CSRO recognizes that follow-on biologic products are a natural evolution of biotechnology and we welcome the introduction of these medications. Rheumatologists are keenly aware of the dramatic long-term, life changing clinical improvements that biological agents have on some of the most crippling and disabling conditions. These biologic response modifying agents are available for the treatment of autoimmune diseases and have a significant impact on improving our patients' quality of life, preventing disability and lowering mortality.

However, we must insist that physicians know what medicine their patient receives and that the prescribing physician is notified in a timely manner whenever a patient's biologic medicine is substituted.

Biologics, and soon biosimilars, will continue to be an important treatment option for rheumatology patients. CSRO appreciates that HB 4472 supports safe introduction of biosimilars into the practice of medicine and urges its enactment.

Sincerely,

Michael Stevens, MD, CSRO President

Amar Majjhoo, MD, Michigan Rheumatism Society President