



VISION HEALTH
ADVOCACY COALITION

April 9, 2024

The Honorable Virginia Lyons
Senate Committee on Health and Welfare
Chair
115 State Street
Montpelier, VT 05633

The Honorable David Weeks
Senate Committee on Health and Welfare
Vice Chair
115 State Street
Montpelier, VT 05633

RE: Support for H.766 – Step Therapy Reform

Dear Chair Lyons and Vice Chair Weeks,

On behalf of the Vision Health Advocacy Coalition, I am writing to support H.766. This legislation would protect Vermont resident’s access to treatment by establishing a transparent and time-appropriate step therapy process. The proposed bill would support better access to medically appropriate treatments for patients with vision conditions.

The [Vision Health Advocacy Coalition](#) (VHAC) promotes patient-centered policies that make life-changing treatments, services, and devices more accessible for people with vision conditions such as thyroid eye disease, glaucoma, Sjögren's syndrome, macular degeneration, and diabetic retinopathy. Through our network of member organizations, VHAC encourages the advancement of ocular science and innovation, educates patients, healthcare providers, and policymakers about access challenges, promotes better vision care delivery, and advocates for access to prevention and appropriate treatment for all patients.

Inappropriate Step Therapy Protocols in Vermont Can be Dangerous for Vision Patients

Step therapy is a cost-saving tactic used by health insurance plans to contain costs by requiring patients to try and fail one or more medications before accessing medication prescribed by their physician. This practice, sometimes called “fail first,” often prioritizes insurer cost savings over an individualized care approach and access to physician-prescribed care. Step therapy is especially burdensome to vision patients, who are then required to simultaneously manage their complex condition(s) and treatment regimens while also attempting to navigate the complexities of the health care system. They can be especially burdensome to those with severe vision impairment as they are more likely also to have type 2 diabetes, depression, stroke, hearing loss, and chronic kidney disease.¹

In Vermont, it has been found that more than 13,000 people have reported blindness or severe difficulty seeing, even with glasses.² Unnecessary challenges placed on Vermont residents to access medically appropriate treatment for their vision condition(s) can lead to further vision damage and irreversible vision loss and further exacerbate their overall health. Interference and limitations on the part of health plans in this process put the patient’s overall health at risk.

¹ “Looking Ahead: Improving Our Vision for the Future.” Centers for Disease Control and Prevention, Centers for Disease Control and Prevention, 7 Nov. 2022, <https://www.cdc.gov/visionhealth/resources/infographics/future.html>.

² U.S. Census Bureau, 2012–2016 American Community Survey 5-Year Estimates, self-report, crude prevalence, all ages.

Patient-Centric Care for Vision Patients in Vermont is Essential

Step therapy protocols interfere with access to appropriate care and significantly impact the core foundation of a patient-provider relationship. Treatment decisions for vision patients should be based on the health care provider's expertise on the unique challenges of their patients, as opposed to a one-size-fits-all insurer-driven step therapy protocol. Vision patients require uninterrupted access to appropriate physician-prescribed treatment(s) proven to manage their vision condition to ensure the quality of life and effective condition management.

H.766 Protects Vermont Residents Against Unnecessary Step Therapy Protocols

H.766 would require the insurer to implement comprehensive guidelines, including an exemption process and a clear, timely response requirement for insurers to respond to these exemption requests. Establishing and implementing a more streamlined process will benefit all Vermont residents. Importantly, while this bill streamlines the step therapy process, it does not prohibit step therapy or the number of steps an insurer can require.

It is estimated that by 2050, without adequate interventions, vision impairment and blindness will increase by 150%. The overall cost of vision problems will increase by 157% to \$373 billion.³ Legislation to protect vision patients and ensure appropriate access to care is imperative to improve overall vision health and lower future costs to the system. We urge you to support this legislation to protect Vermont residents with vision conditions.

On behalf of the Vision Health Advocacy Coalition and our membership, we urge your support for H.766 to protect patients with vision conditions. If we can provide further details or answer any questions, please get in touch with Lacey Teal at lteal@allianceforpatientaccess.org.

Sincerely,

The Vision Health Advocacy Coalition & co-signing organizations:

Alliance for Patient Access
Endocrine Nurses Society
Infusion Access Foundation
Lupus and Allied Diseases Association, Inc.
National Alliance for Eye and Vision Research
Prevent Blindness
Sjögren's Foundation, Inc.
TED Community Organization
U.S. Pain Foundation

³ "Looking Ahead: Improving Our Vision for the Future." Centers for Disease Control and Prevention, Centers for Disease Control and Prevention, 7 Nov. 2022, <https://www.cdc.gov/visionhealth/resources/infographics/future.html>.