March 19, 2025

The Honorable Donald Longmuir
Chair, Political Subdivisions Committee
600 E Boulevard Avenue
Bismarck, ND 58505

The Honorable Clayton Fegley
Vice Chair, Political Subdivisions Committee
600 E Boulevard Avenue
Bismarck, ND 58505

The Honorable Jim Jonas
Vice Chair, Political Subdivisions Committee
600 E Boulevard Avenue
Bismarck, ND 58505

RE: SB 2249 – Step Therapy Reform

To the North Dakota State House Political Subdivisions Committee:

On behalf of the Vision Health Advocacy Coalition, I am writing to support SB 2249. This legislation would protect North Dakota residents' 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, dry eye, 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 North Dakota Can be Dangerous for Vision Patients
Step therapy is a tactic used by health insurance plans to contain costs by requiring patients to try and fail one or more medications before accessing the medication prescribed by their clinician. This practice, sometimes called "fail first," often prioritizes insurer cost savings over an individualized care approach and access to clinician-prescribed care. Step therapy is especially burdensome to vision patients, who are 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 North Dakota, it has been found that more than 27% of people have reported blindness or severe difficulty seeing, even with glasses.[2] Unnecessary challenges placed on North Dakota residents to

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[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.

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.

Patient-Centric Care for Vision Patients in North Dakota is Essential
Step therapy protocols interfere with access to appropriate care and significantly impact the core foundation of a patient-provider relationship. According to a 2022 survey conducted by the Alliance for Patient Access, 98% of physicians identify step therapy as a significant barrier to proper care for their patients.[3] 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 clinician-prescribed treatment(s) proven to manage their vision condition and to ensure quality of life and effective condition management.

SB 2249 Protects North Dakota Residents Against Unnecessary Step Therapy Protocols
SB 2249 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 North Dakota 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.[4] 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 North Dakota residents with vision conditions.

On behalf of the Vision Health Advocacy Coalition and our membership, we urge your support for SB 2249 to protect patients with vision conditions. If we can provide further details or answer any questions, please get in touch with Olivia Perry [operry@allianceforpatientaccess.org.](operry@allianceforpatientaccess.org)

Sincerely,

Olivia Perry

Olivia Perry
Coalition Director
Vision Health Advocacy Coalition
Co-Signing Organizations:
Alliance for Patient Access
American Macular Degeneration Foundation

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[3] Alliance for Patient Access.Physician Burnout & Utilization Management Survey https://allianceforpatientaccess.org/wp-content/uploads/2024/11/AfPA_Physician-Burnout-Utilization-Management_Tri-fold_DIGITAL_November-2024.pdf
[4] "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.

Endocrine Nurses Society
Future Leaders In Sight
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