Dear Commissioner Altmaier:

Thank you for all that you are doing to ensure the health and safety of the residents of Florida, and for your quick action following Governor DeSantis’ declaration of a state emergency. In this time of national public health crisis, health insurance provides a critical gateway to regular, ongoing health care as well as testing and treatment for people who contract coronavirus (COVID-19). We know that by issuing Memorandum OIR-20-01M you have ensured that insurance plans are working intently to offer the full range of benefits, coverage, and accurate information that people will need over the next several weeks and months. To that end, The AIDS Institute is particularly concerned about the welfare of people with compromised immune systems who may be at greater risk should they contract COVID-19.

Our organization, headquartered in Tampa, is dedicated to supporting and protecting health care access for people living with HIV and hepatitis who need to maintain an ongoing treatment regimen while also protecting themselves from contracting this new virus. We urge you to take speedy steps to ensure that insurance plans under your purview are maximizing flexibility for patients with serious, chronic illness to maintain access to care.

The Centers for Disease Control and Prevention (CDC) has issued recommendations encouraging those who have serious chronic medical conditions to take additional precautions to reduce their risk of infection in the event of an outbreak in their community. To prepare for an extended period of social distancing and avoid potential exposure, patients are advised to request extra necessary medications from their providers, and to minimize the frequency and amount of time they spend in public places, such as pharmacies and doctor’s offices. We urge you to adopt the strongest possible language to urge issuers under your purview to take the following steps:

- Waive refill restrictions enabling people with serious, chronic conditions to get early refills of necessary medications, and to get quantities that allow more time between refills.
- Ensure coverage of telehealth appointments with copays less than or equivalent to in-person appointments.

As part of their utilization management strategies, insurance plans often have rigid rules dictating when a prescription may be refilled. **We urge you to encourage health insurance issuers to take the necessary steps to prevent disruptions in drug access during this public health emergency.** Issuers can allow for early refills and overrides of medication quantity limits. Arming patients with an extended supply of their medications during this time of uncertainty can stand to have multiple safeguard effects:
promoting treatment adherence and reducing the risk of exposing a potentially vulnerable population to COVID-19. This is especially important for people living with and at risk for HIV.

Telehealth is a critical tool under normal circumstances for people who live long distances from health care providers, are otherwise home-bound, do not have paid sick leave, or are otherwise constrained from seeking care at a provider’s office. In this time of public health crisis, HIV clinics are temporarily adjusting their clinic protocols to limit in-person medical visits for people with HIV to reduce the spread of COVID-19 and to fully leverage severely strained clinical and public health workforce capacity. We recommend guiding issuers to promote telemedicine appointments for a broad range of providers – those providing HIV- or hepatitis-related services as well as other providers – at the same level of cost-sharing, or less, for an in-person visit. Last week, the Centers for Medicaid and Medicare Services announced this critical step for Medicare enrollees. We urge you to take the next step to protect people with other health insurance in your states.

The AIDS Institute has identified these simple solutions as having a big impact on patient access to health care. We appreciate the work you and the other Florida state officials are doing to develop quick and coordinated responses to this emerging issue. We congratulate Florida for being the first state to be approved by CMS for an 1135 waiver to adapt the state’s public programs to expand access to needed services. However, as our collective attention has turned to optimizing testing, treatment, and containment of COVID-19, we want to make sure that strategies to keep patients with high-risk, chronic conditions healthy are intertwined with the overarching efforts.

Thank you for your commitment to health care access for Floridians living with, and at risk for, HIV and hepatitis. As we continue to monitor this ever-changing issue and states’ responses, we would greatly appreciate hearing about actions your office has taken to address these specific measures. Please feel free to reach me at RKlein@taimail.org with any questions.

Sincerely,

Lab (no labs for april may June) recert relaxation – doesn’t address this in the medication access task force

Rachel Klein
Deputy Executive Director
The AIDS Institute