

**HOUSE OF REPRESENTATIVES
COMPILATION OF PUBLIC COMMENTS**

Submitted to the Committee on Human Services
For HB 3285

Compiled on: Tuesday, April 4, 2023 9:18 PM

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Hearing Date: April 4, 2023 8:00 AM

Casey McPherson
Alliance for Patient Access
Waco, TX

April 3, 2023

Representative Four Price
P.O. Box 2910
Austin, TX 78768

RE: Relating to Medicaid coverage and reimbursement for the provision of certain digital therapeutics

Dear Representative Price,

On behalf of the Alliance for Patient Access (AfPA), I am writing to request your support for House Bill 3285: Prescription Digital Therapeutics, which creates a regulatory framework for prescription digital therapeutics (PDTs). This bill would enable coverage for PDTs within Texas Medicaid by creating a path for billing, allowing patients to benefit from appropriate, FDA-approved treatment.

Founded in 2006, AfPA is a national network of policy-minded healthcare providers who advocate for patient-centered care. AfPA supports health policies reinforcing clinical decision-making, promoting personalized care, and protecting the physician-patient relationship. Motivated by these principles, AfPA members participate in clinician working groups, advocacy initiatives, stakeholder coalitions, and the creation of educational materials.

PDTs are software-based applications aimed to prevent, manage, or treat mental or physical conditions. They are designed and developed with clinically validated tools and data and undergo a rigorous FDA approval process. The FDA has approved the use of multiple PDTs, especially within the mental health space, as medical devices following clinical trials that have proved both their safety and efficacy.

While the FDA has approved several PDTs, the lack of a Texas Medicaid regulatory framework for PDTs makes it challenging for Texas healthcare providers to prescribe these therapies and inhibits patient access to appropriate FDA-approved digital therapeutics. Implementing a PDT regulatory framework would aid in appropriate and timely access to treatment for Texas Medicaid recipients, especially those suffering from mental health issues, by establishing billing codes for PDTs.

Without a robust framework, physicians become bogged down with administrative tasks like coordinating with specialty pharmacies to accurately code and bill, which places an undue burden on the physician offices and specialty pharmacies and causes a significant delay in access to care for Texas Medicaid recipients. With the development and implementation of a robust regulatory framework, PDTs have the potential to also support patient care, increase treatment efficacy, and improve overall health outcomes.

On behalf of the Alliance for Patient Access, we urge you to support HB 3285, a bill that would create a robust regulatory framework to establish billing codes for PDTs in Texas Medicaid and increase access to appropriate therapeutic outpatient treatment. If we can provide further details or answer any questions, please get in touch with Josie Cooper at jcooper@allianceforpatientaccess.org.

Sincerely,
Josie Cooper
Executive Director
Alliance for Patient Access

Eric Kunish, Chair
National Alliance on Mental Illness-Central Texas Chapter
Austin, TX

I support this bill!

Hanna Buro

Academy of Managed Care Pharmacy (AMCP) Southwest Affiliate/Self
Frisco, TX

Like other prescription therapies, PDTs are tested for safety and efficacy in randomized clinical trials, reviewed and approved by the Food & Drug Administration (FDA), and prescribed by a health care provider. PDTs treat a wide variety of diseases and conditions, including mental and behavioral health issues, substance and opioid use disorders, Parkinson's disease, and diabetes. Many can be used on a mobile phone, which helps improve patient outcomes by displaying care reminders and allowing patients to access their therapies in any setting. Although private health payers may elect to cover PDTs, the current landscape is a patchwork of reimbursement strategies and coding practices. This leads to confusion and underutilization.

The Academy of Managed Care Pharmacy (AMCP) and I support improved access to Prescription Digital Therapeutics (PDT).