



August 25, 2025

Michigan Pharmacy and Therapeutics Committee
Michigan Department of Health and Human Services

Re: Public Comment – P&T Committee

Thank you for the opportunity to submit written comments in advance of the September Committee Meeting. I am writing on behalf of AAFA, the Asthma and Allergy Foundation of America, the leading patient organization for people with asthma and allergies and the oldest asthma and allergy patient group in the world. AAFA's mission is to save lives and reduce the burden of disease for people with asthma and allergies through support, advocacy, education and research.

We are writing to strongly urge the committee to include all immunomodulator drugs for asthma on the preferred drug list.

In Michigan, 11.9% of all adults and 6.8% of children were living with asthma as of 2022.¹ Like across the country, the burden of asthma falls disproportionately along racial and ethnic lines; for example, 14.7% of black adults in Michigan have asthma, compared to 10.1% of white adults.²

Detroit is particularly hard hit by asthma. AAFA conducts an analysis each year to rank the 100 most populated metropolitan areas in the country on asthma prevalence, emergency department visits for asthma, and deaths due to

¹ American Lung Association, Current Asthma Demographics. Available at <https://www.lung.org/research/trends-in-lung-disease/asthma-trends-brief/current-demographics>

² Michigan Department of Health and Human Services, "Michigan Asthma Atlas: Prevalence, Hospitalization, & Mortality by Counties & Regions among Michigan Adults & Children" (2019). Available at https://www.michigan.gov/mdhhs/-/media/Project/Websites/mdhhs/Keeping-Michigan-Healthy/Chronic-Disease-Epidemiology/Asthma-Epi/Reports-Presentations/MI_Asthma_Atlas_2019.pdf?rev=a0c5a0070aef4850bb23d41dedf7d7bd&hash=8B0F6A44FF73BF8003C48914AB335F5B



asthma.³ As of 2024, Detroit was the 3rd highest of these “Asthma Capitals” across the country.⁴

Through our Health Equity Advancement and Leadership (HEAL) program, AAFA is supporting a multi-component intervention to help teens and adults manage their asthma through health and wellness programs, access to specialty care, assessment of home environments for asthma triggers, and asthma self-management education. We are invested in this program in Detroit and in the health of people with asthma across the state.

For many patients with mild asthma, routine medications can keep the disease in check and prevent hospitalizations or other serious complications. Moderate-to-severe asthma, however, can be extremely hard to treat. The relatively recent emergence of newer biologics that target the immunological pathway in asthma patients has created new opportunities for effective control of asthma.

These immunomodulators for asthma should be on the preferred drug list and should not be subject to prior authorization requirements. “Fail first” policies or other such steps would delay getting the appropriate care to patients who need these medications, potentially leading to further asthma attacks and complications. Because different people with asthma respond better to different drugs, healthcare providers should be able to swiftly and efficiently prescribe the medication they think will best improve the health status of their patients. Prior authorization requirements can result in unnecessary delays and, ultimately a deterrent to prescriptions, potentially putting these crucial drugs entirely out of reach for patients whose providers lack the bandwidth or staff to process prior authorization requests.

AAFA is very aware that these new drugs – like many drugs and devices in our healthcare system – are costly. It is a priority for our organization to address the high cost of drugs, particularly ensuring that costs do not hinder patient access.

³ Asthma and Allergy Foundation of America, “2023 Asthma Capitals: The Most Challenging Places to Live with Asthma.” Available at <https://aafa.org/wp-content/uploads/2023/09/aafa-2023-asthma-capitals-report.pdf>

⁴ Asthma and Allergy Foundation of America, “2024 Asthma Capitals: The Most Challenging Places to Live with Asthma.”



Asthma and Allergy
Foundation of America

However, putting prior authorization requirements on immunomodulators for asthma is not the right way to save funds. It will negatively impact health, and contribute to existing disparities, in a treatment area where low barriers to accessing these important treatments are crucial.

Thank you for your time and attention.

Sincerely,

Kenneth Mendez
President and Chief Executive Officer
Asthma and Allergy Foundation of America