



May 7, 2026

Medicaid Drug Utilization Review Board

New York State Department of Health

RE: Immunomodulators, May 15 Board Meeting

Submitted via: dur@health.ny.gov

Dear Committee Members:

I am writing on behalf of the Asthma and Allergy Foundation of America (AAFA), 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 understand that at the May 15, 2026 Medicaid Drug Utilization Review (DUR) Meeting, the board will be reviewing systemic Immunomodulators, among other classes of drugs. Thank you for the opportunity to submit written comments in advance of this discussion.

Due to the severe impact of asthma across New York State, and the importance of access to a range of treatment options, AAFA strongly urges the committee to include all immunomodulator drugs for asthma on the preferred drug list.

Asthma in New York State

According to the latest CDC data, in 2021, over 1.5 million adults in New York State, or about one in ten, were living with asthma.¹ Over 315,000 children across the state are also living with asthma.² While the rate of emergency department visits per population has declined over time, there were still nearly 100,000 emergency visits for

¹ Centers for Disease Control and Prevention, Most Recent Asthma State or Territory Data, found at: https://www.cdc.gov/asthma/most_recent_data_states.htm

² New York State Department of Health, "Information on Asthma in New York State" (revised May 2023). https://www.health.ny.gov/statistics/ny_asthma/.



asthma in 2024.³ The prevalence of asthma and persistent asthma worsened among New York Medicaid managed care enrollees from 2023 to 2024.⁴

In our annual analysis on “Asthma Capitals,” AAFA ranks cities in the United States based on asthma prevalence, emergency department visits for asthma, and deaths due to asthma. Unfortunately, in 2025 New York State was well represented in our analysis of the places where asthma is hardest to live, with Rochester at #2, Albany at #8, Syracuse at #18, and Poughkeepsie at #19.⁵

The Importance of Access to Medications

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 step therapy or prior authorization requirements. “Fail first” policies or other such steps 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, their healthcare providers should be able to swiftly and efficiently prescribe the medication that they think will best improve their health status. Prior authorization and step therapy requirements can result in unnecessary delays and ultimately as 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

³ New York State Asthma Dashboard, data retrieved April 27, 2026. Available at https://apps.health.ny.gov/public/tabvis/PHIG_Public/asthma/

⁴ New York State Asthma Dashboard, data retrieved May 4, 2026. Available at https://apps.health.ny.gov/public/tabvis/PHIG_Public/asthma/reports/#state

⁵ AAFA, “Asthma Capitals: The Most Challenging Places to Live with Asthma” (2025). Available at <https://aafa.org/wp-content/uploads/2025/09/aafa-2025-asthma-capitals-report.pdf>



cost of drugs, particularly ensuring that costs do not hinder patient access. However, putting prior authorization or step therapy requirements on immunomodulators for asthma is not the right way to save funds. It will negatively impact health 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