



Academy of  
Managed Care  
Pharmacy®

May 15, 2017

Jami Lifka, Medical Program Specialist  
Office of the Medical Director  
Department of Labor & Industries  
P.O. Box 44321  
Olympia, WA 98504-4321

***Re: CR-102 Proposed Language on Interchangeable Biologics, the Prescription Drug Program  
and Therapeutic Interchange***

Dear Ms. Lifka,

The Academy of Managed Care Pharmacy (AMCP) thanks the Washington Department of Labor & Industries for the opportunity to provide comments in response to *CR-102 Proposed Language on Interchangeable Biologics, the Prescription Drug Program and Therapeutic Interchange*.

AMCP is the nation's leading professional association dedicated to increasing patient access to affordable medicines, improving health outcomes and ensuring the wise use of health care dollars. Through evidence- and value-based strategies and practices, the Academy's 8,000 pharmacists, physicians, nurses and other practitioners, including members in Washington, manage medication therapies, for the 270 million Americans served by health plans, pharmacy benefit management firms, emerging care models and government.

The proposed rule would require dispensing of an interchangeable biological product when available unless the provider specifically indicates that substitution is not permitted for the Washington Prescription Drug Program. AMCP supports the automatic substitution, without additional restrictions or recordkeeping requirements, of interchangeable biological products that are licensed by the Food and Drug Administration (FDA) and determined to meet the safety standards for interchangeability pursuant to 42 U.S.C. Sec. 262(k)(4). Therefore, AMCP urges the Washington Department of Labor & Industries to move forward with finalizing the proposed rule.

Moving forward, AMCP encourages the Washington Department of Labor & Industries to ensure that any updates to laws or regulations governing interchangeable biological products continue to align with the provisions of the *Biologics Price Competition and Innovation Act* and its implementing regulations and guidance documents.

Thank you for the opportunity to provide feedback and for your consideration of our comments. AMCP looks forward to continuing work on these issues with the Washington Department of Labor & Industries. If you have any questions regarding AMCP's comments or would like further information, please contact me at 703-683-8416 or [scantrell@amcp.org](mailto:scantrell@amcp.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Cantrell". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Susan A. Cantrell, RPh, CAE  
Chief Executive Officer