

October 30, 2019

Dear Premera Blue Cross:

First of all, on behalf of the EndBrainCancer Initiative (EBCI), www.EndBrainCancer.org, I would like to thank Premera Blue Cross for inviting public comments on your 2020 coverage guidelines for molecular testing related to solid tumor and hematologic cancers as we realize it is not common for health insurance companies to open up their coverage policy decisions to public comment. Thank you for taking this coverage decision very seriously and considering public input.

Our understanding is that Premera Blue Cross' 2020 proposed coverage guidelines to only cover specific molecular tests and does not cover *complete genomic profiling and in fact, these guidelines do not cover 50 or more genomic targets*. We believe that not including complete genomic profiling, also known as Whole Genomic Sequencing (WGS) or Next Generation Sequencing (NGS), is doing patients with brain cancer or other solid tumor a major disservice, is keeping them from accessing personalized treatment options, derails research, and therefore, significantly pushes back the timeline in finding a cure for this disease. The EBCI, patients with brain tumors and other solid tumors and their caregivers/families, and I strongly urge Premera Blue Cross to reconsider this decision.

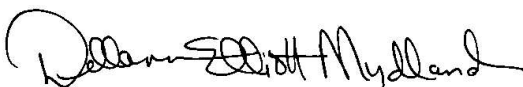
We advocate for complete genomic profiling for brain tumors and other solid tumors for these reasons:

- Complete genomic profiling of brain tumor tissue offers patients with brain cancer access to promising treatments and specific clinical trials, potentially improving patient outcomes.
- The information obtained from Next Generation Sequencing (NGS) is essential for matching patients to advanced treatments (such as immunotherapies and targeted therapies currently available in clinical trials for brain cancer).
- Other insurance providers, including Blue Cross Blue Shield of Massachusetts, currently fund DNA profiling as a medical necessity and we urge Premera Blue Cross to adopt the same policy in the Pacific Northwest.
- Medicare and Medicaid are now covering NGS and our expectation is that Premera Blue Cross will follow their lead. Additionally, recent changes in NCCN Guidelines recommend expanded genomic profiling.
- Immunotherapy and targeted therapies are revolutionizing the treatment of all cancers. Expanded genomic testing is essential to identify these additional potential treatment opportunities and for capturing the cost savings resulting from matching each patient to the most effective treatment from the start. At the EndBrainCancer Initiative, we believe that Premera Blue Cross should take a proactive approach to diagnosis and treatment of all solid tumors, much as immunization for diseases such as shingles and measles is routinely done to prevent unnecessary patient suffering and to reduce overall medical expense.
- Expanded genomic testing contributes to broad data collection and will help reveal key insights into many different forms of cancer resulting in medical breakthroughs benefiting patients across a wide variety of solid tumors.

Much of our day-to-day work and patient services at the EndBrainCancer Initiative centers around connecting brain cancer patients to the best and most advanced treatment options, diagnostics, devices and specialists as possible. While comprehensive genomic testing is essential to qualify for many emerging and advanced therapies, including clinical trials, it is just not a feasible diagnostic option for those who cannot expect these costs to be covered by their medical insurance.

Again, we would like to thank you for this opportunity to comment and greatly look forward to counting Premera Blue Cross among those who fund DNA profiling as a medical necessity for all solid tumor and hematologic cancer patients.

Blessings,



Dellann Elliott Mydland

President & CEO

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