



April 15, 2022

On behalf of the Wisconsin State Chapter of the American Society for Metabolic and Bariatric Surgery (ASMBS), Wisconsin Academy of Nutrition and Dietetics (WAND), Obesity Action Coalition (OAC), Obesity Medicine Association (OMA) and The Obesity Society (TOS), we urge the Employee Trust Funds (ETF) and the Group Insurance Board (GIB) to adopt state employee health plan coverage for pharmacotherapy and medical nutrition therapy (aka nutrition counseling) for the treatment of overweight or obesity.

Our groups truly appreciate the positive ETF staff recommendation surrounding bariatric surgery in 2019, which led the GIB to approve coverage of “bariatric surgery and required precursor weight management and nutrition services for members with BMI of 35 or greater” beginning in benefit year 2020. To date, numerous state employees have taken advantage of this new benefit and are now healthier and thriving because of the surgery and accompanying counseling services.

Since WAND, OAC and the ASMBS Wisconsin State Chapter submitted its January 14th comments to the GIB, a major coverage announcement regarding obesity treatment has been issued by the federal government. In a [February 17, 2022, carrier letter](#) and subsequent [technical guidance](#), the federal Office of Personnel Management (OPM) released specific instructions for health insurance carriers that administer Federal Employee Health Benefit (FEHB) plans -- “clarifying that FEHB carriers are not allowed to exclude anti-obesity medications from coverage based on a benefit exclusion or a carve out...” and that “FEHB Carriers must have adequate coverage of FDA approved anti-obesity medications (AOMs) on the formulary to meet patient needs and must include their exception process within their proposal.”

In issuing this new guidance, OPM is quite clear -- emphasizing that “obesity has long been recognized as a disease in the US that impacts children and adults...” and that “obesity is a complex, multifactorial, common, serious, relapsing, and costly chronic disease that serves as a major risk factor for developing conditions such as heart disease, stroke, type 2 diabetes, renal disease, non-alcoholic steatohepatitis, and certain types of cancer.” This new guidance comes eight years after OPM first warned plans that it is not permissible to exclude weight loss drugs from FEHB coverage on the basis that obesity is a “lifestyle” condition and not a medical one or that obesity treatment is “cosmetic.”

These definitive statements from OPM should ensure that all federal employees, and their family members, will now have access to comprehensive obesity care. We believe that state employees in Wisconsin deserve the same access and hope that the GIB will support this goal by adopting coverage for pharmacotherapy and medical nutrition therapy (aka nutrition counseling) for the treatment of overweight or obesity. Our growing knowledge regarding the complexity of obesity, the tremendous advances in treatment, and the growing recognition of, and support for treating obesity as the chronic disease that it is, clearly make health plans that continue to exclude coverage for evidence-based treatment avenues out of date and out of touch with the current scientific evidence surrounding obesity care.

Should you have any questions or need additional information, please feel free to contact us or Chris Gallagher via email at chris@potomaccurrents.com or telephone at 571-235-6475. Thank you.