

Impact of PBM Practices on Patients

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Role of PBMs on Rx Access & Affordability

▶ Formulary Decisions

- Which Drugs Covered
- Adding Newly Approved Drugs
- Removal of Drugs
- Non-medical Switching
- Increased Use of Drug Exclusions

Role of PBMs on Rx Access & Affordability

▶ Patient Costs

- Drug Tiering
 - ▶ Can be based on Rebates
 - ▶ “Specialty Drugs”
 - ▶ Discriminatory Plan Design
 - Adverse Tiering
- Beneficiary often pays Deductible & Co-insurance on List Price of the Drug
 - ▶ Does not account for any rebate PBM receives
 - ▶ Patients who generate the rebates don’t benefit at pharmacy counter

Role of PBMs on Rx Access & Affordability

▶ Copay Accumulators

Instituted by insurers and pharmacy benefit managers (PBMs) that prevent manufacturer copay assistance contributions from counting towards a beneficiary's deductible and maximum out-of-pocket spending limits

Role of PBMs on Rx Access & Affordability

- ▶ **Access Restrictions**
 - Utilization Management (step-therapy, PA)
- ▶ **Pharmacy Access**
 - Mail order, specialty, or retail
 - Which pharmacy you can use
- ▶ **Little transparency**
- ▶ **Little regulation**
- ▶ **Contribute to overall cost of drugs**

Important for FTC to Hear from Patients & Consumers

- ▶ Submit Individual Comments by April 25 Deadline
 - Discuss practices you have seen impacting patients
 - Submit to:
<https://www.regulations.gov/commenton/FTC-2022-0015-0001>
- ▶ Sign on to group Letters

Thank you!

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