

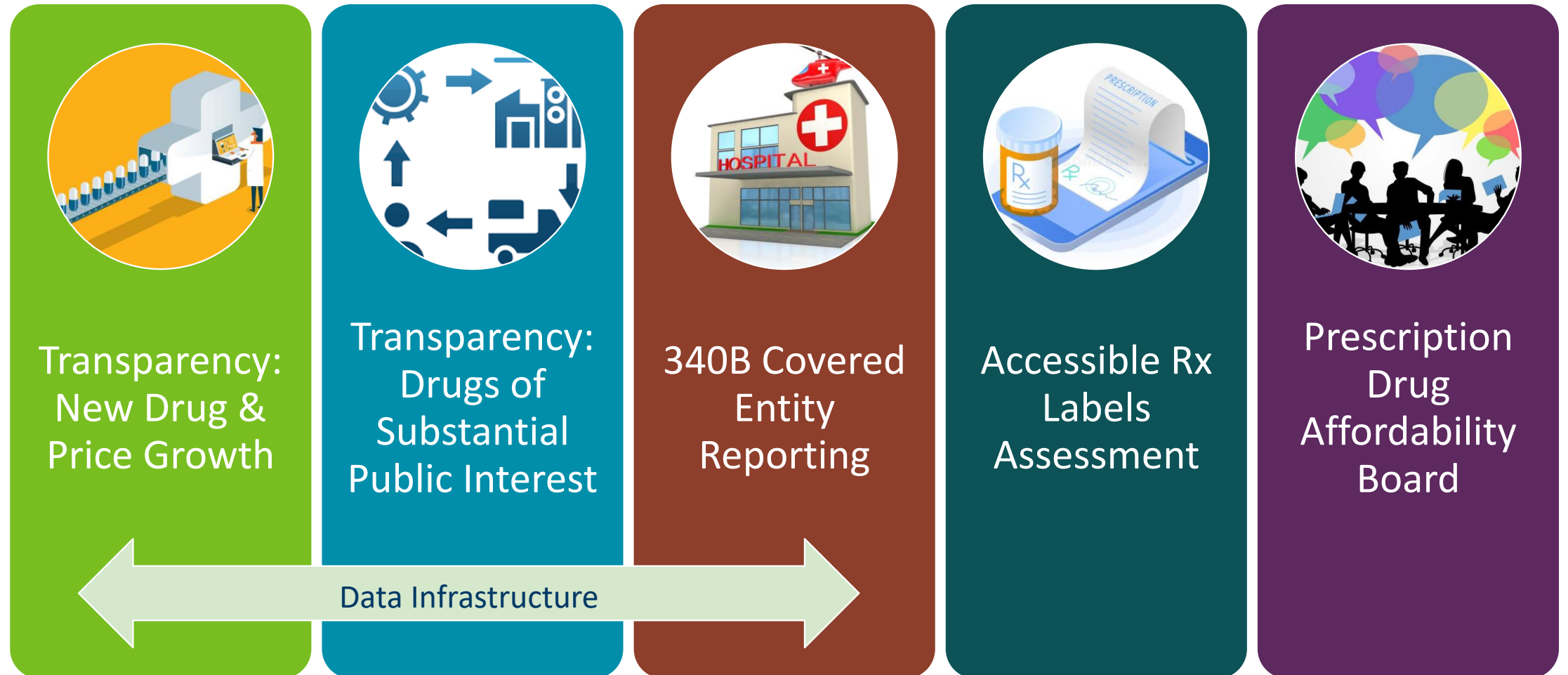


Prescription Drug Price Transparency: Public Interest List

Annelisa Steeber

RxPT Work and Intersections with the PDAB

Health Economics Program (HEP) Rx Program Areas



Reporting Streams under Prescription Drug Price Transparency Act (MS 62J.84)

Program:

RxPT

(data posted online, trade secret data withheld, legislative report, enforcement)

Reporting
Trigger:

Statutory thresholds
for pricing events; ongoing

Quarterly list identified by MDH

Reporting
Stream:

Price Growth
(Subd. 3)

New Drug
(Subd. 4)

REPEALED
Acquisitions
(Subd. 5)

Public Interest
(Subds. 10-14)

Reporting
Entities:

Manufacturers

Manufacturers

Manufacturers

Manufacturers

Wholesalers

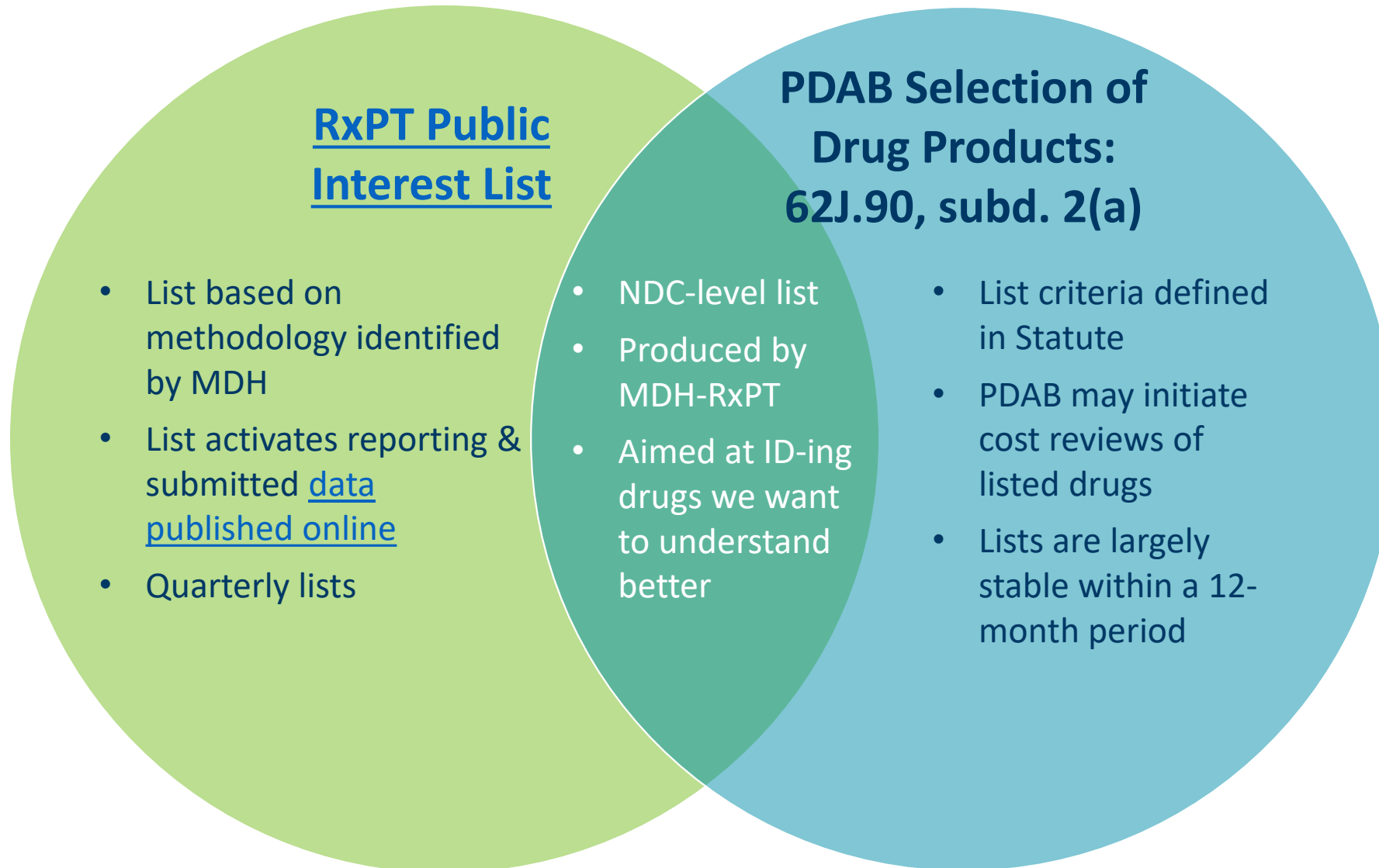
PBMs

Pharmacies

MDH Obligations under the Prescription Drug Affordability Act

- Rx drug price information; decision to conduct cost review (MS 62J.90)
 - Provide **RxPT data** to the Board [62J.90, subd. 1(a)]
 - Provide technical assistance to the Board related to **identifying drug products** (NDCs) that meet the criteria under 62J.90, subd. 2(a) [62J.87, subd. 5(b)]
 - Provide **consultation** to the Board in identifying prescription drug products with costs that create significant affordability challenges for the state health care system or for patients [62J.90, subd. 2(b)]
- Prescription Drug Affordability Advisory Council (MS 62J.88)
 - Delegate one staff to be a member of the Advisory Council [62J.88 subd. 2]

RxPT-PI List vs. List of Drug Products for PDAB

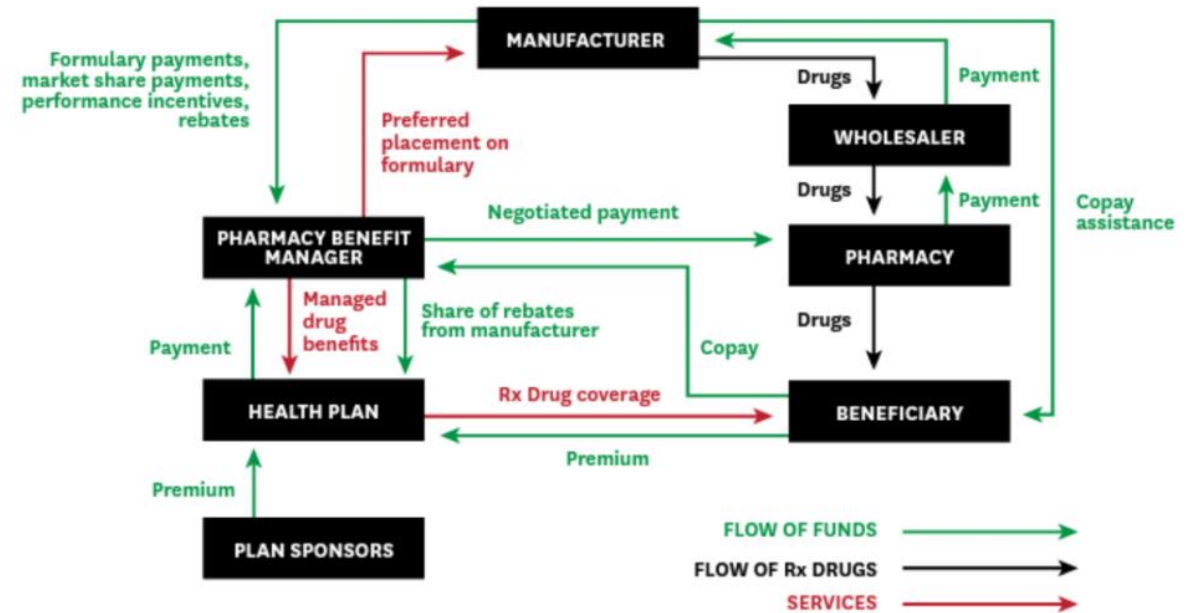


RxPT Expansion – Public Interest

New *Drugs of Substantial Public Interest* Reporting

- Reporting entities
 - Drug manufacturers
 - Wholesalers
 - Pharmacy benefit managers (PBMs)
 - Pharmacies
- Data
 - Prices along supply chain, including inputs and outputs like costs, rebates, fees, patient assistance, and reimbursements
- Based on a quarterly list of drugs of *substantial public interest* identified by MDH

Figure 1: Conceptual model of the flow of products, services and funds for non-specialty drugs covered under private insurance and purchased in a retail setting

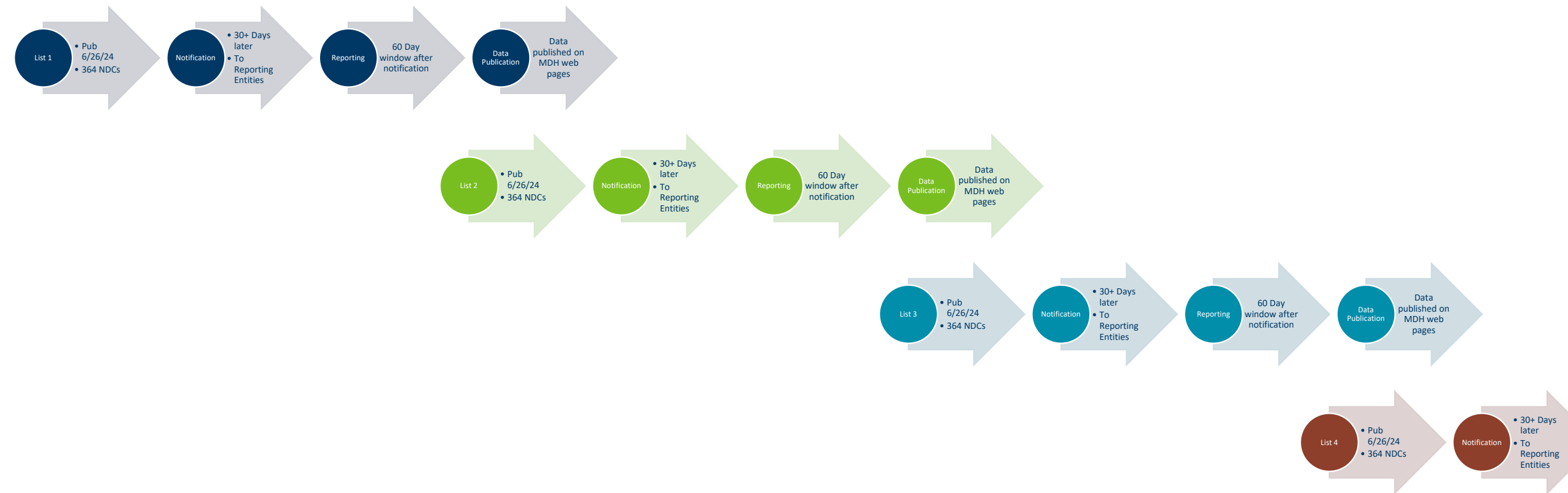


Source: <https://healthpolicy.usc.edu/research/flow-of-money-through-the-pharmaceutical-distribution-system/>

Process for One Reporting Cycle



Process Overview



Therapeutic Class & Drug Families

Therapeutic Class:

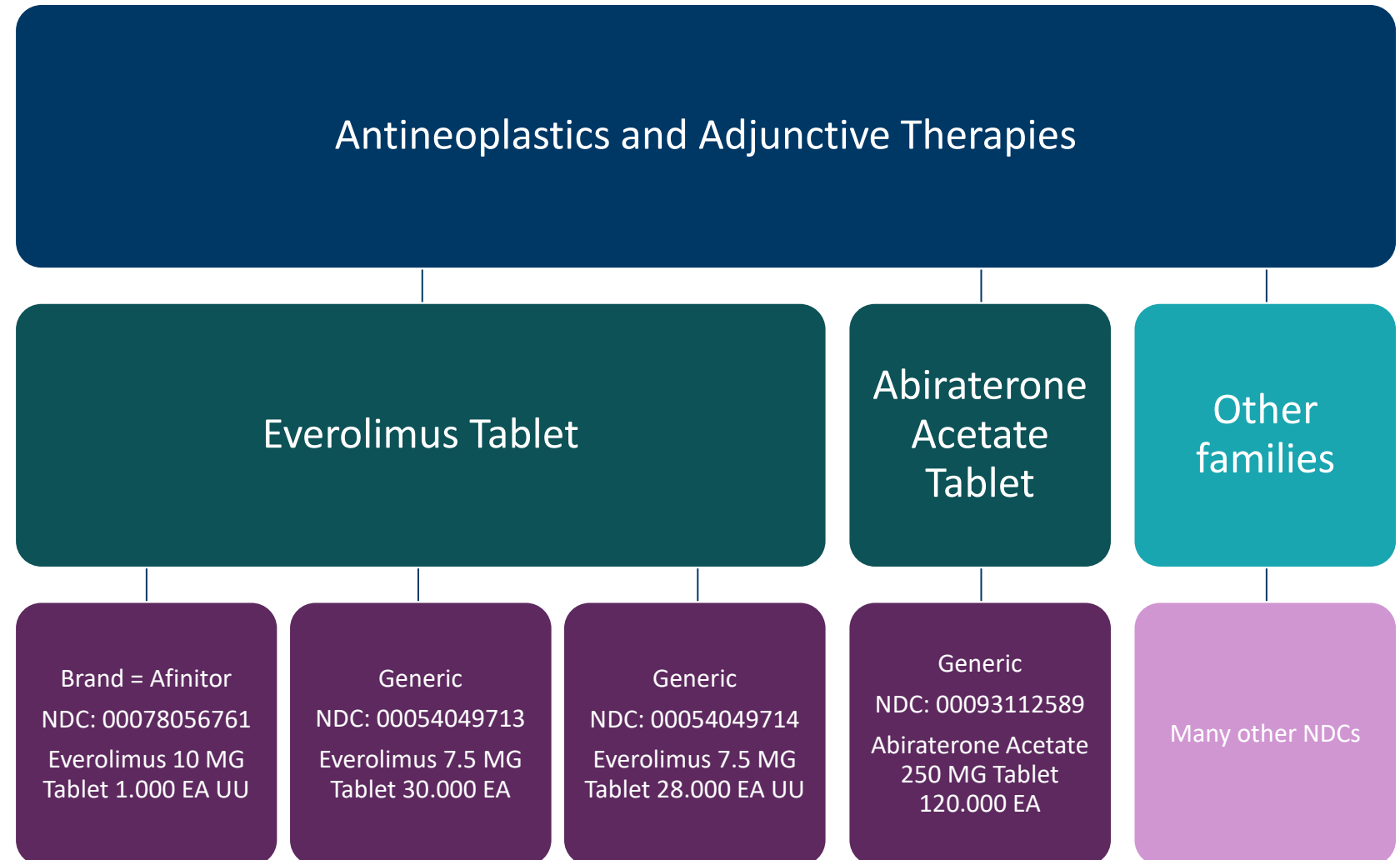
A grouping of medications based on their intended effects and the conditions they treat.

Drug Family:

Grouping of drug products that share a unique generic drug description (or nontrade name) and dosage form

National Drug Code (NDC):

Unique product identifier based on, but not limited to, manufacturer, dosage, packaging, and method of delivery.



PI Data at the NDC level:

Manufacturers

- Price History
- Manufacturing, Distributing, & Marketing Costs
- Units Sold
- Revenue
- Profit
- Rebates Paid
- Patient Assistance
- Foreign Pricing

Wholesalers

- Units Acquired
- Acquisition Cost
- Rebates Received
- Units Sold
- Revenue
- Rebates Paid

PBM's

- Units Administered
- Reimbursement Received
- Rebates Received
- Admin Fee Received
- Rebates Paid

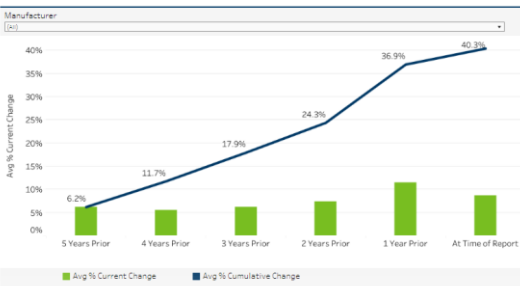
Pharmacies

- Units Acquired
- Rebates Received
- Pricing Units Dispensed
- Payment Received
- Average Cash Price

Data & Dashboards

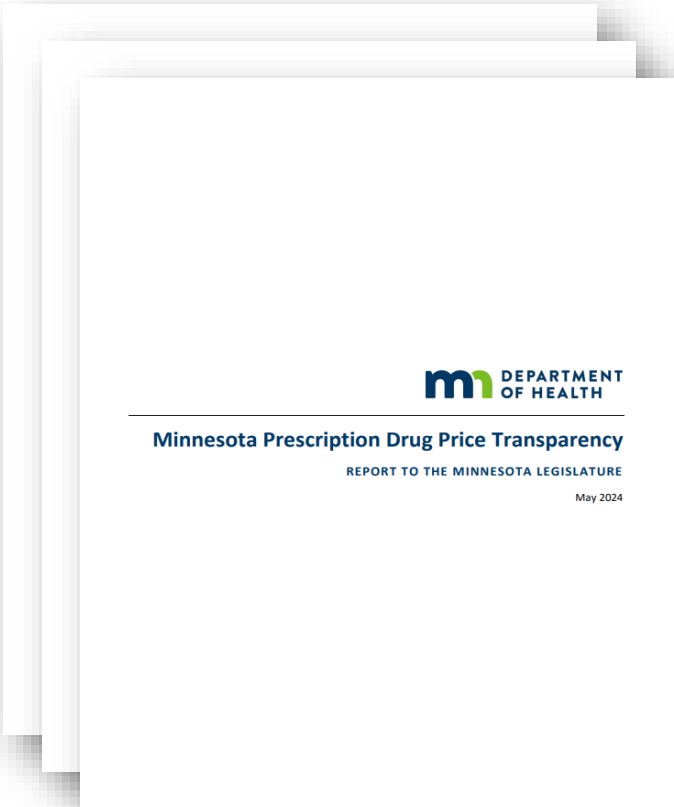
	A	B	C	D	E
	NDC	Drug Description	Wac At Introduce	Year of Introduce	WAC Last Day 1 Year Prior
2	00008042303	ANTIVENIN MICRURUS FULVIUS (antivenin micrurus ful	4950.00	2016	6,271.18
3	00008083321	Effexor XR Caps 75mg 30s	88.08	1997	511.72
4	00008083322	Effexor XR Caps 75mg 90s	264.24	1997	1,535.30
5	00008083621	Effexor XR Caps 150mg 30s	95.94	1997	557.40
6	00008083622	Effexor XR Caps 150mg 90s	287.82	1997	1,672.14
7	00008083721	Effexor XR Caps 37.5mg 30s	78.60	1997	456.71
8	00008083722	Effexor XR Caps 37.5mg 90s	235.80	1997	1,370.09
9	00009000501	Solu-Cortef (hydrocortisone sodium succinate) 1 gm	35.36	2012	114.15
10	00009001104	Solu-Cortef (hydrocortisone sodium succinate) 1 gm			
11	00009001306	Solu-Cortef (hydrocortisone sodium succinate) 1 gm			
12	00009002901	Xanax Tabs 0.25mg 100			
13	00009002902	Xanax Tabs 0.25mg 50			
14	00009005501	Xanax Tabs 0.5mg 100			
15	00009005503	Xanax Tabs 0.5mg 500			
16	00009005707	Xanax XR Tabs 0.5mg			
17	00009005907	Xanax XR Tabs 1mg 60			
18	00009006607	Xanax XR Tabs 2mg 60			
19	00009006807	Xanax XR Tabs 3mg 60			
20	00009009001	Xanax Tabs 1mg 100s			
21	00009009004	Xanax Tabs 1mg 500s			
22	00009009401	Xanax Tabs 2mg 100s			
23	00009335901	Prepidil (dinoprostol) 0.1 mg tablets			
24	00009335901	PREPIDIL (dinoprostol) 0.1 mg tablets			
25	00009379401	CORVERT (ibutilide fumarate) 0.5 mg tablets			
26	00009379422	CORVERT (ibutilide fumarate) 0.5 mg tablets			
27	00009722402	Atgam (lymphocyte immunoglobulin G) 10 mg/mL			

Price Increase - Five Year Price Analysis



Manufacturer	NDC	Item Description	WAC Effective Date	WAC 5 Years Prior	% Change 5 Years Prior	WAC 4 Years Prior	% Change 4 Years Prior	WAC 3 Years Prior	% Change 3 Years Prior	WAC 2 Years Prior	% Change 2 Years Prior	WAC 1 Year Prior	% Change 1 Year Prior	WAC After Reported Increase	% Change for Reported Increase
AcelRx Pharmaceuticals, Inc.	63623043011	Sufentanil Citrate 30 MCG Tablet Sublingual 10/000 EA UD	10/3/2022	\$583	0.0%	\$583	0.0%	\$583	0.0%	\$583	0.0%	\$583	0.0%	\$787	34.3%

RxPT Data Outputs



Legislative Reports

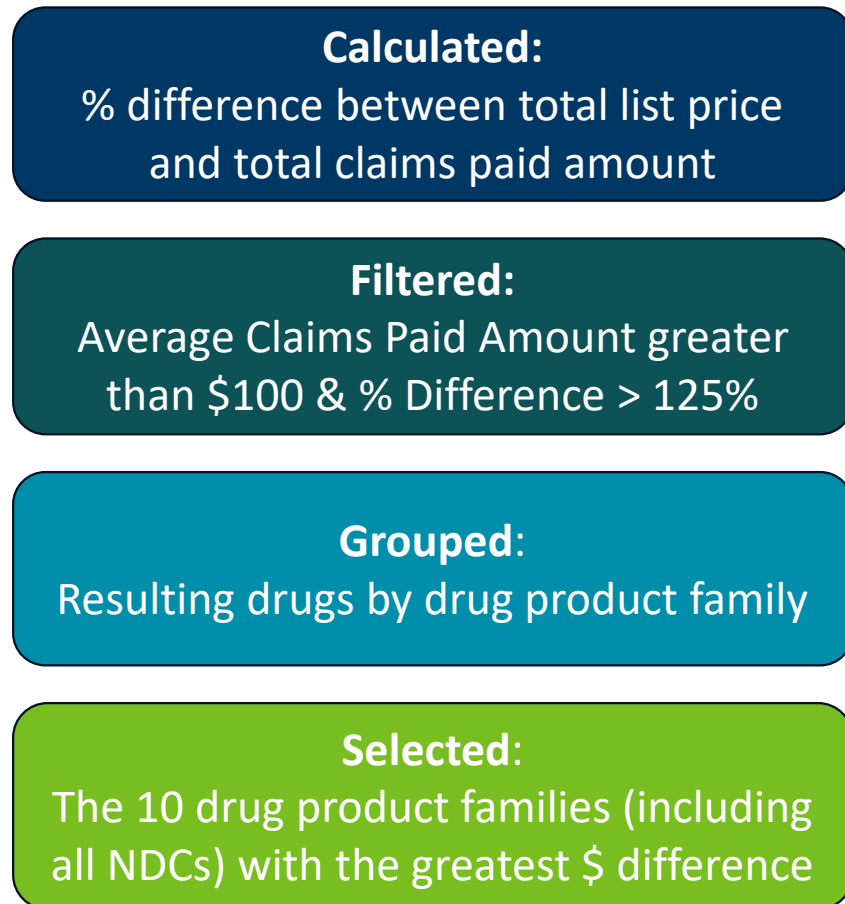
How we're thinking about the PI list

“providing greater consumer awareness of the factors contributing to the cost of prescription drugs in the state” (MS 62J.84)



- Enhance **understanding** and provide **transparency** into the factors contributing to the cost of prescription drugs in the state.
- Look beyond manufacturers.
- Focus on drug pricing at the **systemic level**; most lists will focus on a **single feature** of the supply chain.
- May repeat a particular list of drugs; however, MDH will aim to explore **different aspects** of the market with each list.
- Lists will focus on the **drug family** level.

First List of Drugs of Substantial Public Interest



NDC-Level Calculations

- **Average Total Claims Paid Amount** =
(sum of (claim paid amount * number
of claims at that \$ amount)) / number of
claims
- **Average Total List Price** = sum of (list
price * number of claims during list
price effective period) / number of
claims
- **% Difference** = Total Claims Paid
Amount / Total List Price

The List

Drug Family	Treatment or Purpose	Count of NDCs	Total Claims	Total of WAC	Total Paid Amount	Difference*
Abiraterone Acetate Tablet	Cancer	35	5,499	\$ 4,884,579	\$ 19,237,685	294%
Capecitabine Tablet	Cancer	39	3,925	\$ 437,774	\$ 3,087,526	605%
Dimethyl Fumarate Capsule Delayed Release	Multiple sclerosis (MS)	27	3,191	\$ 7,293,900	\$ 13,192,104	81%
Emtricitabine-Tenofovir Disoproxil Fumarate Tablet	HIV, PrEP	26	16,415	\$ 1,313,035	\$ 13,390,587	920%
Everolimus Tablet	Immuno-suppressant	38	1,011	\$ 7,626,430	\$ 9,569,824	25%
Glatiramer Acetate Solution Prefilled Syringe	Multiple sclerosis (MS)	8	7,056	\$ 25,300,371	\$ 28,836,961	14%
Imatinib Mesylate Tablet	Cancer	36	3,462	\$ 2,949,368	\$ 10,543,139	257%
Lacosamide Tablet	Anti-seizure	71	22,345	\$ 11,486,951	\$ 13,638,024	19%
Methylphenidate HCl Tablet Extended Release	ADHD	55	150,624	\$ 44,156,967	\$ 46,376,225	5%
Pancrelipase (Lipase-Protease-Amylase) Capsule Delayed Release Particles	Digestive aid	29	18,205	\$ 31,338,420	\$ 39,003,881	24%
Total	--	364	231,733	\$ 136,787,795	\$ 196,875,956	--

Thank You!

And what questions do you have for us?