

# Drug Price Transparency Stakeholder Zoom Meeting for Pharmacy Benefit Managers

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# Welcome & Logistics

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- ▶ Welcome & Introductions
  - ▶ Team introductions
- ▶ Logistics
  - ▶ Zoom Instructions
  - ▶ This Zoom meeting is VIDEO RECORDED
- ▶ Agenda Review

# Agenda

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- ▶ Drug Price Transparency Program Overview
- ▶ Reports Outstanding
- ▶ Number of Registrants
- ▶ Status of Accomplishment
- ▶ Up Next in Journey
- ▶ Listening Session – We want to hear from you!
- ▶ Contact Information – Update Information!

# Drug Price Transparency Program Overview

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- ▶ Chapter [43.71C RCW](#) directs the Health Care Authority to implement a drug price transparency program through reporting from health carriers, pharmacy benefit managers, drug manufacturers and pharmacy service administrative organizations.

# Definitions of PBM

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“Pharmacy benefit manager” means the same as in RCW 19.340.010

# Prescription Drug

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A drug regulated under chapter 69.41 or 69.50 RCW, including generic, brand name, specialty drugs, and biological products.

# PBM Data Reporting

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## **Requires submissions by PBM's to the HCA by March 1st each year:**

1. All discounts, including the total dollar amount and percentage discount, and all rebates received from a manufacturer for each drug on the pharmacy benefit manager's formularies;
2. The total dollar amount of all discounts and rebates that are retained by the pharmacy benefit manager for each drug on the pharmacy benefit manager's formularies;
3. Actual total reimbursement amounts for each drug the pharmacy benefit manager pays retail pharmacies after all direct and indirect administrative and other fees that have been retrospectively charged to the pharmacies are applied;
4. The negotiated price health plans pay the pharmacy benefit manager for each drug on the pharmacy benefit manager's formularies;

# PBM Data Reporting: continued

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5. The amount, terms, and conditions relating to copayments, reimbursement options, and other payments or fees associated with a prescription drug benefit plan;
6. Disclosure of any ownership interest the pharmacy benefit manager has in a pharmacy or health plan with which it conducts business; and
7. The results of any appeal filed pursuant to RCW 19.340.100(3).
8. Section 4 also gives HCA the authority to audit PBM financial records for the purposes of ensuring the information submitted under this section is accurate. All of the information in this section is not open to public disclosure.



# HCA Reporting Requirements

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- ▶ Must compile & analyze data.
- ▶ Prepare annual report for the public and the legislature synthesizing the data to demonstrate the overall impact that drug costs rebates, and other discounts have on health care premiums.
- ▶ Make a recommendation on how to provide advance notice of price increases to purchasers in WA.

# Status of Accomplishments

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- ▶ Posted Progress Report January 2021
- ▶ 34 PBMs required to report in June 2021
- ▶ Received complete reports from 9 PBMs
- ▶ Automated the Extension request form
- ▶ Established a SFT site to submit reports
- ▶ Created a process to register and update contact information
- ▶ Solicited feedback and updated submission guide
- ▶ Provided a Tech Support inbox [HCADPTTechSupport@hca.wa.gov](mailto:HCADPTTechSupport@hca.wa.gov)
- ▶ Finalized [Chapter 182.51 WAC](#)

# Up Next in Journey

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- ▶ Update Submission Guides for March 2022 reporting
- ▶ Update registration information
- ▶ Finalize the data analytics
- ▶ Publish report for January 2022

# Listening Session Prompt Questions:

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- ▶ Tell us about your experience submitting reports to HCA
- ▶ What areas of the data submission process did we do well and what areas can we improve on?
- ▶ What areas of communication did we do well and what areas can we improve on?
- ▶ When should we update the data submission guide and share the new version with you so that you have enough time to review and provide comments?
- ▶ What data fields in the data submission guide did you have a difficult time understanding or interpreting?
- ▶ How can we improve our descriptions in the data submission guide, so it is clear what we are expecting?

# Listening Session Prompt Questions:

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- ▶ Were there any fields that you think should be nullable? If yes, why?
- ▶ Were there any fields that should allow for negative values? If yes, why?
- ▶ What sections of the data submission guide did you find confusing?
- ▶ Did you find the error log helpful? If no, how can we improve it, so it is more useful when correcting errors?

# For More Information

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- ▶ **Visit:** <https://www.hca.wa.gov/billers-providers-partners/prescription-drug-cost-transparency-update>
- ▶ **Email us:** [drugtransparency@hca.wa.gov](mailto:drugtransparency@hca.wa.gov)
  
- ▶ Tech Support inbox [HCADPTTechSupport@hca.wa.gov](mailto:HCADPTTechSupport@hca.wa.gov)