

PUBLIC SUBMISSION

As of: July 26, 2021
Received: July 15, 2021
Status: Pending_Post
Tracking No. kr5-4bpi-osma
Comments Due: July 23, 2021
Submission Type: Web

Docket: EBSA-2021-0005

Request for Information Regarding Reporting on Pharmacy Benefits and Prescription Drug Costs

Comment On: EBSA-2021-0005-0001

Request for Information: Reporting on Pharmacy Benefits and Prescription Drug Costs

Document: EBSA-2021-0005-DRAFT-0002

Comment on FR Doc # 2021-13138

Submitter Information

Name: Anonymous Anonymous

General Comment

https://www.regulations.gov/document/HHS_FRDOC_0001-0824

Document ID: HHS_FRDOC_0001_0824

Request for Information: Reporting on Pharmacy Benefits and Prescription Drug Costs

Federal Register Number: 2021-13138

June 22, 2021

Dear Ms. Rina Shah, Mr. Dellana, Mr. Matthew Litton, and Ms. Christina Whitefield,

I am writing this public comment as a Master of Social Work student at The University of Memphis, in Memphis, Tennessee. My interest in Proposed rule HHS_FRDOC_0001_0824, Request for Information: Reporting on Pharmacy Benefits and Prescription Drug Costs is rooted in my pursuit of medical social work to holistically support not only individual client needs as they face a life changing diagnosis, chronic illnesses, pain, and more, but also to effect changes in policy at local and national levels to help alleviate the conditions of chronic stress in which many fatal illnesses thrive.

Due to the need for transparency in the rising cost of healthcare, and in order to lower consumer costs, increase competition, and avoid pharmaceutical monopolies, Proposed rule HHS_FRDOC_0001_0824, Request for Information: Reporting on Pharmacy Benefits and Prescription Drug Costs, should be implemented to require healthcare group plans and healthcare insurance issuers to collect data, analyze trends, and issue bi-annual public reports on pricing trends and the effects of drug costs on rates. This proposed rule increases drug manufacturer transparency for the public which will allow for fairer rates and lower overall costs for the consumer. Consistent, effective, incremental changes in healthcare transparency will protect the public financially from overpaying and to allow for a greater free market which will give consumers more choice and ultimately, more power. Without transparency, consumers are unable to prepare for healthcare costs which ultimately affect both the government and taxpayers when the government is forced to step in and cover costs through social programs. Additionally, consumers will be able to see when the generic option is more cost effective, regardless of co-pay assistance plans offered by pharmaceutical companies.

According to National Infusion Center Association (NICO), drug manufacturers claim to create these programs to lower the out-of-pocket costs to consumers, yet require that co-pays and deductibles are first used, resulting in the drug companies receiving nearly double the payment (2020).

Proposed rule HHS_FRDOC_0001_0824, Request for Information: Reporting on Pharmacy Benefits and Prescription Drug Costs, will ease the financial burden placed on patients by holding pharmaceutical manufacturers to a level of transparency that place the drug consumers financial interests ahead of Big Pharma's and create a marketplace research savvy consumers can feel more confident about.

Threlkeld, C. (2020). Understanding copay accumulators: Who really benefits? National Infusion Center Association (NICO). <https://infusioncenter.org/understanding-copay-accumulators-who-really-benefits/>

Sincerely,
Concerned MSW Student