

# Practical Strategies and Tactics to Manage Rising Rx Costs

ECHI Pharmacy Program Meeting

Brian N. Anderson, MBA Thursday, May 19, 2016

#### **Topics for Discussion**

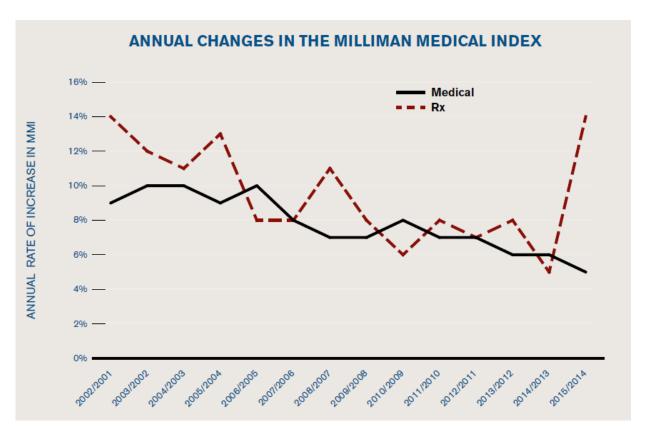
- Background of the PBM Industry
  - Prescription Drug Trends
  - Drug Delivery
  - Historical Approaches and Considerations
  - Current State of the Market
- Managing Costs
  - Specialty Drugs
  - Clinical Programs
  - Pharmacy Coordination
  - Management Intervention and Strategy
- PBM Contracts
  - Savings Opportunities
  - Case Study
  - Predicting the Future
- Q&A



## **Trends**

Prescription Drug:

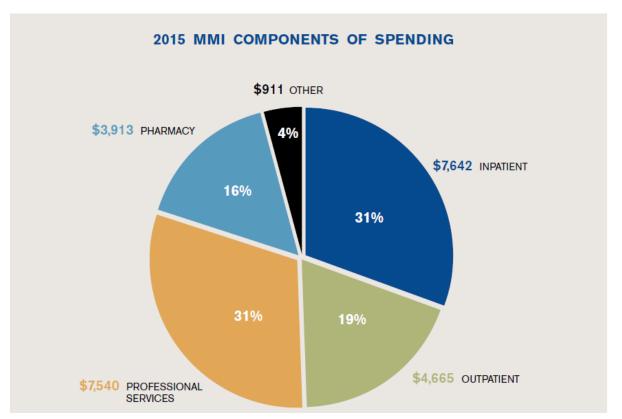
#### **Annual Spending**





**Source: 2015 Milliman Medical Index** 

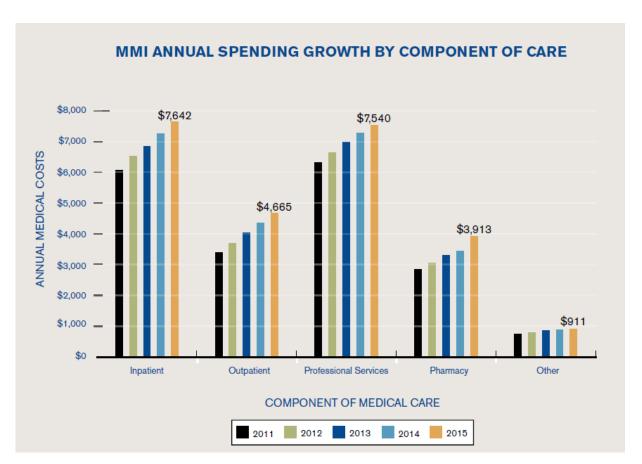
#### **Breakdown of Spending**





Source: 2015 Milliman Medical Index

#### **Trends**





Source: 2015 Milliman Medical Index

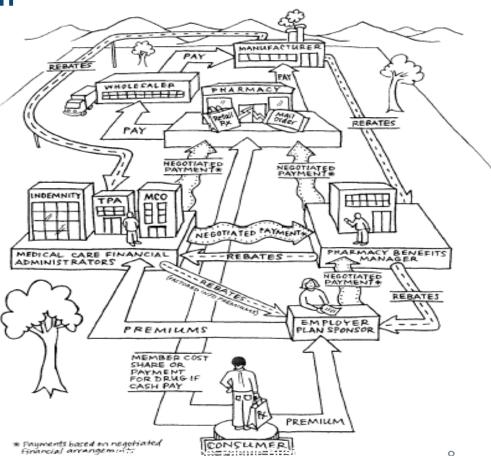
## Drug Delivery and PBM Basics

The PBM Industry:

**Pharmacy Benefit Supply Chain** 

#### Main stakeholders:

- Manufacturers
- Wholesalers
- Pharmacies
- Group Purchasing Organizations
- Pharmacy Benefit Managers
- Plan sponsors
- Consumers





#### **Goals and Objectives**

PBMs are intermediaries between pharmaceutical manufacturers, pharmacies, and various pharmaceutical purchasers (employers, health plans, etc.)

PBM goals and objectives include:

- Manage drug spend appropriately
- Maximize manufacturer rebates
- Optimize pharmacy discounts and dispensing fees
- Decrease administrative costs
- Improve health outcomes
- Facilitate efficient administration of pharmacy benefits
- Growth and Profitability



## HISTORICAL APPROACHES AND CONSIDERATIONS

The PBM Industry:

#### **Key Events for PBMs in the Last Decade**

- Medicare Part D
  - Increased 65+ covered population that PBMs can manage by ~ 50%
  - 65+ pharmacy spend is 3-6x that of a < 65 population</li>
  - More covered members => more contracting leverage
  - Pass-through pricing in Medicare Part D
- Major brands lose patent and shift pharmacy spend to more profitable generics
- Specialty pipeline continues to grow
- Increased scrutiny with more government business
- More competition from smaller niche PBMs and large health plans
- M+A activity within and across sectors



## CURRENT STATE OF THE MARKET

The PBM Industry:

#### **PBM Considerations – Preferred Networks**

- Better contracting terms in exchange for lower cost sharing
- Pharmacies exchange better terms for additional market share
- Essential in Part D, spilling into commercial RFPs as requested option
- Pharmacies pay rebates to Part D plans for preferred placement
- CVS Caremark structure allows for increased coordination of pharmacy and PBM business
- Tradeoffs with preferred vs. exclusive networks
- Access issues
- More pharmacies nationally than several fast food chains combined
- More pharmacies than medical options in PPO style plans
- CMS investigating access closely in Part D given proliferation of preferred networks



#### **PBM Considerations – Formulary Management**

- Payers more willing to exclude certain medications to save money if limited or no clinical downside
  - Hep C is latest example
  - Brands being forced to compete in other brand only classes, including biologics
- Market developing rapidly as more therapeutic classes added to exclusion list
- More opportunities recently with flood of new generic products and existing brands looking to preserve market share while they can
- Customization of formularies occurring at lower membership levels
- Tiering structures getting larger under Part D and spilling into commercial
- Preferred / Non-preferred generic and specialty tiers
- Willingness to move "house" brands to generic tiers and high cost generics to brand tiers



#### **PBM Considerations – Formulary Management**

- Pharmacy manufacturer coupon programs
  - Seen as way to circumvent formulary
  - Not used in Medicare Part D
- Large formulary differences among PBMs and plans causing confusion among doctors
- E-prescribing may not have plan design information by member
- More physician time spent trying to attain access



#### **PBM Considerations – Risk**

#### Accepting insurance and other risk

- Started in mid-1990's with bad PBM risk deals and big losses
- Gun-shy since then but starting to re-emerge
- Risk Mechanisms:
- Part D Almost all midsize and large PBMs participate
- Contractual trend guarantees or GDR targets
- Outcomes and adherence related measures
- Reinsurance with smaller employers looking at self-funding

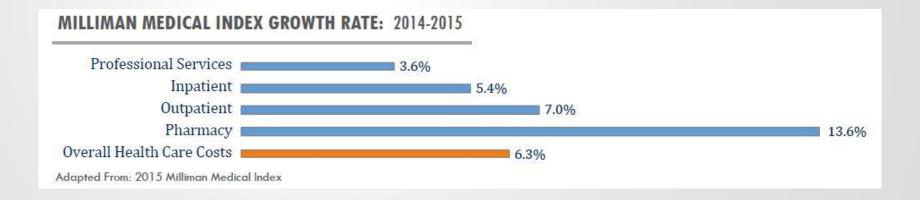


# Prescription Benefit Management

Eric Cannon, PharmD, FAMCP

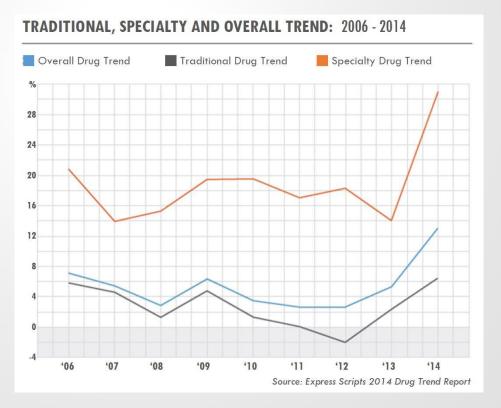


## **Dramatic Increase in Pharmacy Costs**



Pharmacy costs increased dramatically from 2014-2015 by 13.6 percent, outpacing other components of medical care with nearly all of the change due to an increase in the average cost per prescription.

## **Specialty Spending**



## **Specialty Medications**

Drugs to treat rare or complex diseases

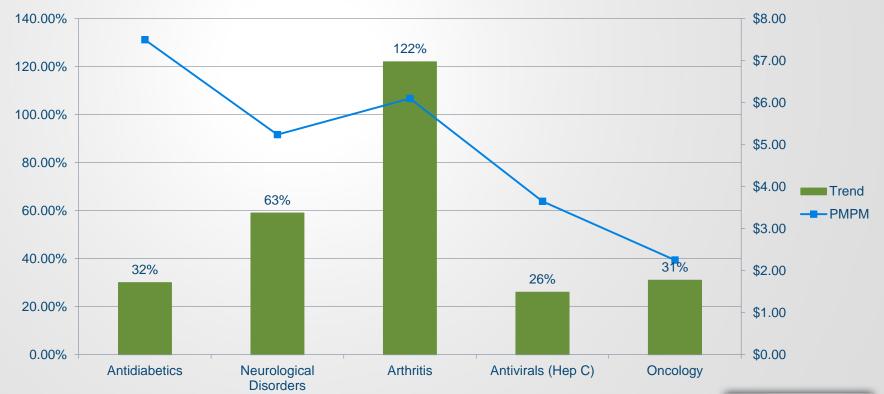
Require close clinical monitoring, training and management

Frequently require special handling

May have limited access or distribution

**High Cost** 

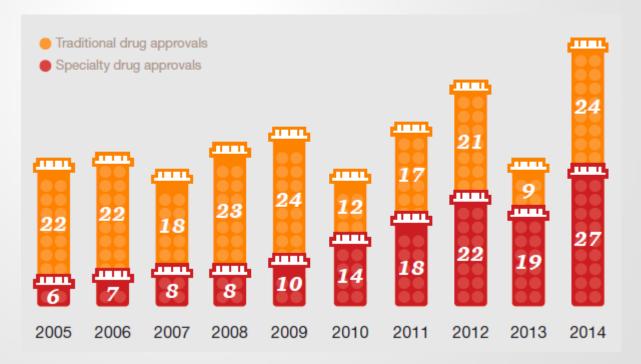
### **2015 Top Annual Increases by Drug Category**

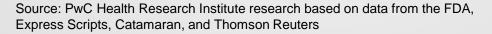


## 2015 Top Drugs

Humira – Rheumatoid Arthritis	\$23,800,000
Enbrel	\$18,100,000
Novolog	\$17,600,000
Lantus – Diabetes	\$16,000,000
Tecfidera - Multiple Sclerosis	\$14,900,000
Copaxone	\$11,650,000
Freestyle Test Strips – Diabetic Testing	\$8,000,000
Harvoni	\$6,000,000

## **Speciality Drug Approvals 2005 to 2014**





#### **Management Interventions and Strategies**

- Plans are increasingly willing to add administrative barriers or add other management options
  - Therapeutic Substitution
  - Prior Authorization
  - Step Therapy
  - Clinical Protocols
  - Quantity Limits
  - Dose Optimization
  - Tablet Splitting
  - 90 day Retail Programs
  - Pay for performance

## **Generic Drugs**

- Most plans and PBM's have benefited from use of generic drugs
- Generic launches are allowing plans to capitalize in many therapeutic areas
- Generic interventions include:
  - Mandatory substitution
  - Generic steps
  - Generic sampling
  - Physician and Pharmacy incentives

### **Biologic Management Strategies**

- Improve contracting and discounts
- Control source of distribution
- Specialty pharmacies
- Prior authorization
- Clinical programs/Disease management
- Benefit design (medical vs pharmacy, copay vs coinsurance)
- Increase generic share

## **Elaprase**

- Used to treat mucopolysaccharidosis type II (Hunter's syndrome)
- Significantly increased the 6-minute walk test performance, but did not significantly increase Forced Vital Capacity
- \$40K per month (30kg patient)
- Incidence one case per 65K-130K live births

## **Key Areas for Clinical Programs**

- Diabetes
- Multiple Sclerosis
- Autoimmune
- Hepatitis C
- Opioid Abuse
- Oncology

## **Pharmacy Coordination**

Hospital Pharmacies

**Specialty Pharmacy** 

Infusion Center Pharmacies

SelectHealth Patient/Physician

Community Pharmacies

Homecare Pharmacy Home Delivery Pharmacy

Integration to ensure the right drug, at the right time, in the right place

## **Value of Integration**

- Access:
  - Community Pharmacies
  - Home Delivery
  - Homecare
  - Speciality

- Patient Engagement and Adherence
- Formulary Management
- Clinical Best Practices
- Clinical Programs

Programs:

## **Questions?**





### **PBM Contracts**

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#### Some of the Questions to be Answered During the Presentation

- How can plans assess the extent to which their current PBM contracts are competitive?
- What changes to the negotiation and contracting process must health plans make to develop a competitive and long-term PBM relationship?
- What steps should plans and their consultants take to keep contracts competitive and stay current on pricing and industry trends?
- How can plans guard against the addition of contracting language that may make deals less competitive?
- How do different pharmacy network options affect how competitive a contract is? How should plans assess the options?
- How should plans respond when their contracted PBM is acquired or merges?



## Request for proposals

Savings Opportunities:

## Request for Proposals PBM Selection

Important questions to ask when evaluating a PBM:

- Does the PBM fulfill the organization's needs in terms of costs, customer service, range of drugs available, and other factors?
- Is the organization getting the best possible financial arrangement?
- Is the contract written in a way that allows for transparency?
- Is the PBM willing to contract auditable and sustainable terms that the organization finds acceptable, such as transparency and fiduciary responsibility?
- Is the organization geared up to change PBMs (i.e., to go through with the implementation process and the oversight of PBM operations)?



#### **Overview of the RFP Processes**

- Prepare RFP
- Distribute
- Obtain questions
- Conduct a bidders conference call or in-person bidders meeting
- Respond to the questions
- Analyze financial bids
- Grade responses
- Summarize the responses
- Make recommendations for finalists
- Interview finalists



#### **Draft Request for Proposal**

- Financial requirements
  - Request traditional and pass-through pricing bids
  - Request minimum discount
  - Request minimum per claim guarantees for rebates from manufacturers
- Qualitative requirements
  - Administer current plan design and current formulary
  - Maintain pharmacy access
  - Performance guarantees
  - Utilization management capabilities
  - Various other contractual provisions



#### **Next Steps**

- Select finalists and request best and final offers
- Determine need for site-visit or on-site PBM presentation
- Review pros and cons of traditional vs. pass-through
- Review contract terms
- Begin implementation



# Important Contracting provisions

Savings Opportunities:

#### **Effective Contracting**

- Effective contracting is crucial to the success of the plan's pharmacy benefit.
- Plans should consider doing the following every two years:
  - Renegotiate
  - Request aggressive renewal terms
  - Procurement
- Contract enforcement
  - Audits
  - Reconciliations
  - Invoice reviews



#### **Key PBM Contracting Issues**

- Aggressive financial discounts
- "Lesser of" pricing for all network and mail-order pharmacies
- Defining the pricing guarantees
- Defining minimum rebate guarantees
- Defining key terms, such as transparency or pass-through
- Quarterly or year-end financial guarantee true-ups
- Agreeable termination clause
- Clear definition of a generic drug
- Measurable performance guarantees
- Auditing and market check provisions
- Customer service and member communications
- 100% of the rebates



#### **Exhibits to the PBM Contract**

- The original proposal
- List of administrative services
- Financial terms
- Performance guarantees with definitions
- Proposed maximum allowable cost (MAC) list
- Specialty drug price list
- HIPAA business associate agreement
- Plan design document
- Plan pharmacy program specifications



### **Market Checks**

Savings Opportunities:

#### **Benefits**

- Market checks can be used as leverage in contract renewals to remind the PBM what level they should be performing at.
- If the current PBM refuses to meet the market check rates that are known to be consistent within the market, a plan may want to take its business to the market to procure a new PBM contract.
- In our experience, plans are often able to improve their pricing arrangements using a market check or RFP between 5%-30% of their currently contracted rates, with an average savings around 11%.



#### **Overview**

- Review the current pricing arrangement
- Compare the current arrangement to recent offers seen or negotiated with other PBMs
- Analyze a full plan year of data and then project forward based on assumptions identified below
- Chose pricing offers based on competitive guarantees
- Reprice projected claims using the current contract and the comparator PBM pricing
- Calculate the repriced total cost as ingredient cost, plus dispensing fees, plus administrative fees, less rebates over the projection period
- Report the findings



# Market Check Case study

Savings Opportunities:

#### **Case Study: Market Check**

Total Cost Over Contract Pe	riod (in Thousands)				
		Current Pricing	PBMA - Original Offer	Recommended Target	PBMA - Final Offer
Retail	Brand	\$9,536	\$9,176	\$9,176	\$9,149
	Generic	\$9,540	\$8,109	\$5,724	\$7,030
Mail (35-90 Days)	Brand	\$3,822	\$3,586	\$3,448	\$3,482
	Generic	\$2,506	\$1,942	\$1,504	\$1,659
Mail (1-34 Days)	Brand	\$37	\$34	\$34	\$34
	Generic	\$20	\$16	\$12	\$13
Specialty		\$2,947	\$2,836	\$2,836	\$2,836
Retail/Mail/Specialty Combin	led Total	\$28,407	\$25,700	\$22,735	\$24,204
Rebates	Retail	\$1,324	\$1,558	\$1,656	\$1,558
	Mail	\$632	\$744	\$760	\$744
	Specialty	\$0	\$0	\$0	\$0
	Total	\$1,956	\$2,302	\$2,415	\$2,302
Dispensing Fees		\$808	\$685	\$685	\$685
Admin Fees		\$61	\$0	\$0	\$0
Total Estimated Costs (C	Costs less Rebates)	\$27,319	\$24,083	\$21,005	\$22,588
% of Current Contract		0.00%	-11.85%	-23.11%	-17.32%
Total Estimated Savings		\$0	\$3,236	\$6,314	\$4,731



### **Post-contract Oversight Audit**

Savings Opportunities:

#### **Verifying Contract Compliance**

- Once the PBM's operations are in place, an audit is necessary to:
  - Ensure the integrity of the contracted arrangement
  - Verify that the PBM is providing the sponsor and its members all contract benefits
  - Validate invoicing and rebate payments
- The audit should involve a thorough assessment of administrative functions, including:
  - The accuracy and timeliness of cost controls, systems, and procedures
  - The accuracy of management information
  - The accuracy and timeliness of claim payments and rebates
  - The effectiveness of internal controls



## PREDICTING THE FUTURE

The PBM Industry:

#### **PBM Considerations**

- Expect more diversification and expansion beyond traditional middleman duties, including M+A activity
- Major concerns around government price controls that could reduce or eliminate their role
- Where is the next silver bullet with most traditional brands already losing patent and a big specialty pipeline? (Biosimilars?)
- Continued emphasis on pharmacy adherence as means to reduce medical costs and improve outcomes
- More exclusivity within pharmacy networks and formularies



#### **PBM Considerations**

- Greater customer demand for market checks and/or shorter contracts
- Continued growth in specialty pharmacy
- Managing the pharmacy spend in both the medical and pharmacy benefit
- Focus on consumerism
- New approaches to PBM contracting and pricing

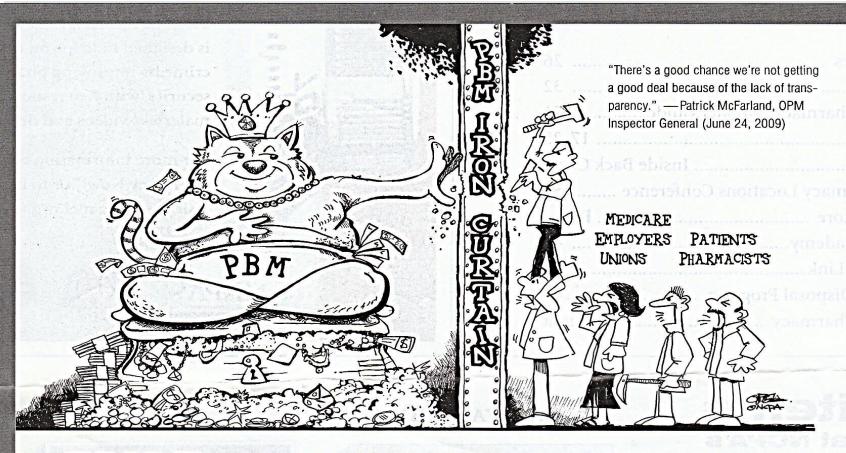


#### **2017 Considerations**

Newer items to consider to maximize the savings:

- Should you consider an exclusionary formulary?
- What would you look for in a preferred pharmacy network?
- What will your specialty drug spend be in future years?
- Should you consider having certain drugs process through the medical or pharmacy benefit? (White bag vs. Brown bag)
- What are those rebates really worth?





**PBM Transparency** – key to lower Rx costs

### Thank you!

### Questions

www.milliman.com/Solutions/Services/Pharmacy-benefits-consulting/www.milliman.com/MyRxConsultant/

**Average Wholesale Price (AWP):** A published national average of list prices charged by wholesalers to pharmacies. Average wholesale price (AWP) is not an actual price that purchasers or PBMs normally pay. It is used by most PBMs for setting prices reimbursed by outpatient pharmacies and prices charged to plan sponsors.

**Brand Name Drug:** A patented drug generally manufactured and sold by a drug labeler (single source brand name). There are instances in which more than one labeler may produce a brand name drug. These types of brand name drugs are referred to as multi-source brand name drugs.

**Dispense as Written (DAW):** Dispensed as written (DAW) is a code indicating which party is requesting the brand to be dispensed when a generic drug is available. The DAW codes are as defined by National Council for Prescription Drug Programs (NCPDP) as follows:

- 0 No product selection indicated
- 1 Substitution not allowed by prescriber
- 2 Substitution allowed patient requested product dispensed
- 3 Substitution allowed pharmacist selected product dispensed
- 4 Substitution allowed generic drug not in stock
- 5 Substitution allowed brand drug dispensed as generic
- 6 Override
- 7 Substitution not allowed brand drug mandated by law
- 8 Substitution allowed generic drug not available in marketplace
- 9 Substitution allowed by prescriber but plan request brand



**Exclusion:** Exclusion means that a drug, product, or service is not covered.

**Fill Date:** The date the prescription was filled; sometimes called "service date.

**Generic Drug:** Generic drug is a drug that is no longer protected by a patent. These drugs can be manufactured and distributed by different companies and must be approved by the U.S. Food and Drug Administration. Generic equivalent drugs are the same as brand name drugs in dosage form, safety, strength, route of administration, quality, performance characteristics, and intended use. Generic alternative drugs are not chemically identical to the brand in question, but are in the same therapeutic class and intended to treat the same conditions as the brand in question.

**Mail Order:** Mail order is a participating pharmacy that provides home delivery services through common carriers, as well as other services described in the PBM contract.

**Medi-Span:** Medi-Span is a division of Wolters Kluwer Health, Inc. that publishes a master drug database that provides a codified drug dictionary, drug vocabulary, and drug pricing for prescription drugs and medication-based over-the-counter products in the United States.

**National Council for Prescription Drug Programs (NCPDP):** A not-for-profit membership organization (www.ncpdp.org) that creates national standards for electronic healthcare transactions used in prescribing, dispensing, monitoring, managing, and paying for drugs and pharmacy services.



**National Drug Code (NDC):** National drug code (NDC) is an 11-digit number, which serves as a universal product identifier for drugs. The U.S. Food and Drug Administration maintains and publishes NDC numbers and listing information.

**Over-the-Counter (OTC) drugs:** Over-the-counter (OTC) drugs are drugs that can be bought without a prescription. They are not covered under most prescription plans.

**Paid Claim:** For the purposes of this report, a paid claim refers to a claim that was not rejected by the PBM.

Pharmacy Benefit Manager (PBM): A pharmacy benefit manager (PBM) is an entity that administers the prescription drug portion of a health insurance plan offered by plan sponsors: self-insured employers, insurance companies, and health maintenance organizations (HMOs). PBMs provide pharmacy claims processing, mail order pharmacy services, and other services, such as rebate negotiations with drug manufacturers, development and management of pharmacy networks, formulary management, drug utilization review programs, generic drug substitution, and disease management programs.

**Pharmacy Network:** A pharmacy network consists of retail pharmacies, independent pharmacies, and mail order pharmacies under contract with a PBM contractor to provide services to a prescription drug plan, typically at a negotiated discounted fee.



**Retail Pharmacy Network:** Retail pharmacy network is also known as "network." This refers to a negotiated list of available pharmacies. The retail network can include both national chain pharmacies and independent pharmacies.

**Specialty Drug:** Specialty drugs are pharmaceutical products that are typically expensive and require special handling and monitoring. They can be administered through injection, infusion, inhalation, or other non-oral methods. Many are biologically developed (biologics) and can be used to treat chronic, life threatening, and rare conditions such as various types of cancer, growth hormone deficiencies, multiple sclerosis, hemophilia, and rheumatoid arthritis. There is not an industry standard definition of a specialty drug; each PBM tends to have its own definition and list of drugs that it treats as specialty drugs

**Specialty Pharmacy:** Specialty pharmacy is a contracted pharmacy providing prescription items that require special handling or administration. A PBM usually contracts the discounts, administrative fees, and dispensing fees at a rate different from other discounted arrangements. Many PBMS own their own specialty pharmacies.

**Usual and Customary (U&C) Charge:** U&C charge is the amount a retail pharmacy will charge a patient who is not covered by a benefit plan or who chooses to self-pay for the prescription. This is also referred to as the "cash" price.

