

Accumulator Adjustment Programs

- Many chronic disease patients use copay assistance, such as copay cards or manufacturer assistance, to pay for their life-saving medications.
- Copay accumulator programs prevent such assistance from counting towards patient cost-sharing, such as their deductible or annual out-of-pocket maximum.
- Ex:
 - It's the start of a new plan year in January and you are on a biologic with a list price of \$3,000 a month. You use your copay card at the pharmacy and make a regular copayment at the counter. In March, you've reached the limit on your copay assistance. As a result, when you go to refill your prescription, you will owe \$3,000, the full cost of your drug, because the deductible has not yet been paid down.
- Due to these programs, patients may struggle to afford and adhere to their medications as insurers and PBMs seek to shift more cost-sharing responsibility to patients.



Accumulator Adjustment Programs Trends

- AIDS Institute report shows that:
 - In 45 states and the District of Columbia, there is at least one plan with a copay accumulator adjustment policy
 - In 14 states, every plan includes a copay accumulator adjustment policy
 - In 32 states, at least two-thirds of plans include a copay accumulator adjustment policy
 - Only 3 states have fewer than half of plans that include a copay accumulator policy
- MME study of health insurer medical and pharmacy directors:
 - Around 60% of payers strongly agree that CAPs have the potential to shift costs from plans to patients.
 - A majority (54%) of payers agree CAPs could adversely impact patient medication adherence



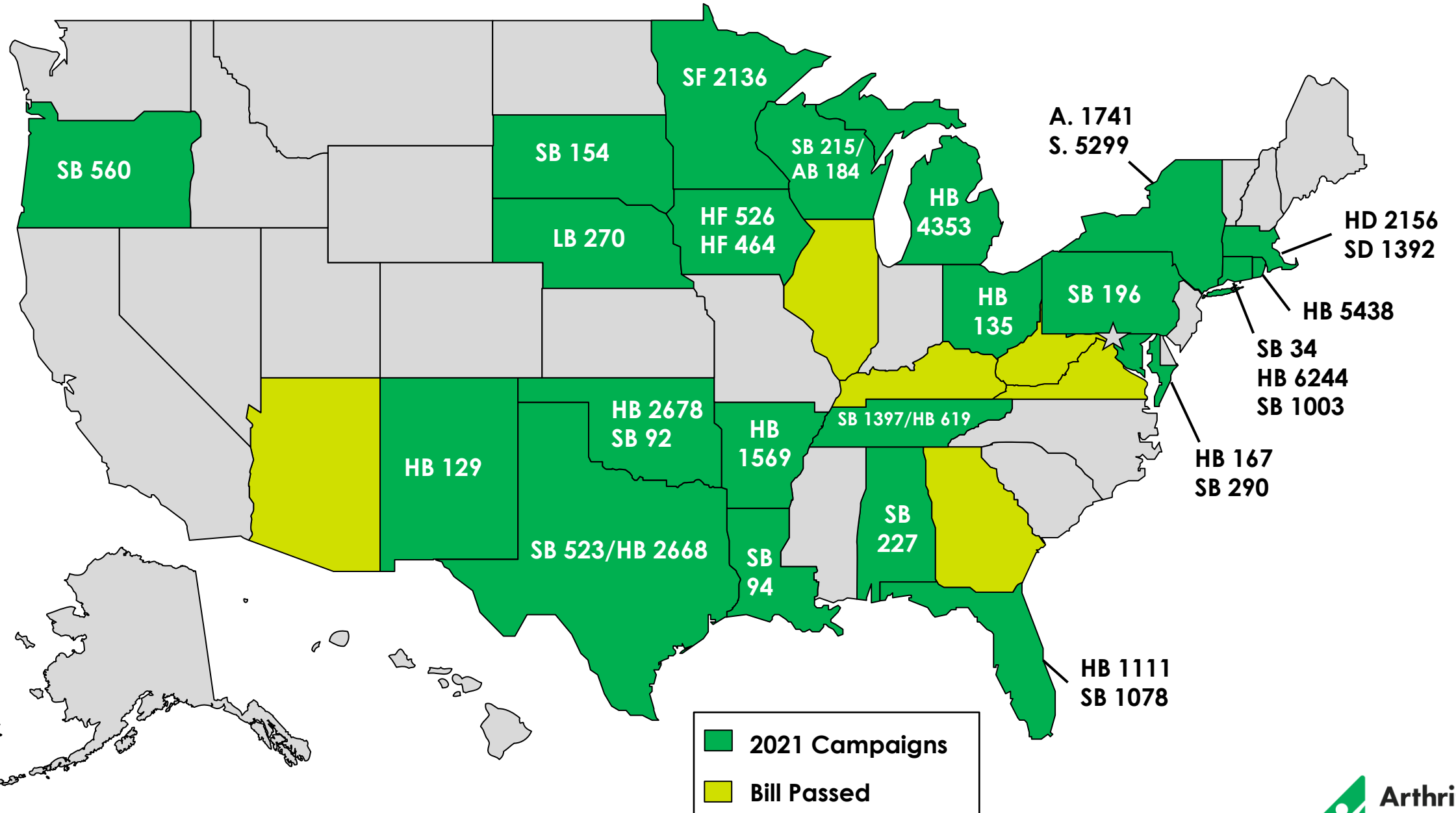
All Copays Count Coalition Model Language

- “When calculating an enrollee's overall contribution to any out-of-pocket maximum or any cost-sharing requirement under a health plan, a carrier/issuer/insurer or pharmacy benefit manager shall include any amounts paid by the enrollee or paid on behalf of the enrollee by another person.”
- Endorsed by coalition partners such as:
 - American Medical Association, American Cancer Society Cancer Action Network, AIDS Institute, National Hemophilia Foundation, Cancer Support Community, American Kidney Fund and many others



States with Active Legislation to Address Accumulator Adjustment Programs

April 2021



Opposition Arguments

- Assistance vs. Accumulator Adjustment Programs
- HHS Notice of Benefit and Payment Parameters (NBPP)
- Plan Design
- Generics
- Medicare/Medicaid/CA/MA
- Premiums

