Uncovering Prescription Drug Pricing: Insights from Payer Price Transparency Regulations

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Research Objectives

Despite a regulatory delay in the requirement that US payers publicly post negotiated prices for prescription drugs, some payers have chosen to make this information available. The objective of this study was to assess the availability and utility of net pharmaceutical pricing data posted by commercial payers in response to the CMS Transparency in Coverage rule. Prescription drug price transparency is a critical topic for health economics and outcomes researchers in the life sciences industry. Realworld evidence analyses involving newly available price transparency data can shed light on pricing strategies, market access, and drug affordability. By assessing costeffectiveness and value-based pricing with this data, researchers may contribute to balancing patient access, innovation, and sustainable growth, ultimately fostering collaboration among industry stakeholders for fair, patient-centric pricing models.

Data

Effective July 1, 2022, the Transparency in Coverage now requires payers to maintain their own publicly available machine-readable files detailing negotiated prices negotiated with hospitals, health systems and other providers. This is allowing greater insights into costs of care across multiple aspects of the US health system. Clarify Health has compiled this publicly available data from 65 national and regional payers as of February 2023, including United Healthcare, Cigna, Aetna CVS, Humana, and multiple Blue Cross Blue Shield (BCBS) payers, and is combining with health insurance claims data. Presented analyses focus on two national payers (Payer A and Payer B) reporting negotiated rates for prescription drugs in price transparency data.

Methods

This descriptive analysis assesses the availability of negotiated prescription drug rates and their applications. From national drug codes (NDCs), we categorized drugs into therapeutic categories using both Generic Product Identifiers (GPIs) from the Wolfers-Kluwer Medi-Span database and Pharmacy Quality Alliance (PQA) groupings. Clarify commercial and Medicaid prescription drug claims were used to assess claims volume. Summary statistics highlight both the availability of net pricing information as well as differences in pricing by therapeutic category and across payers. Estimation of average net prices for specific drugs and across categories highlights the high negotiated rates of multiple drug categories and specific therapies.

Acknowledgements

A broad, multidisciplinary team at Clarify Health compiled, enriched, and analyzed the price transparency and claims data utilized in presented analyses.

Table Voretige

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le I: Cross-Pay	er Comparison	of Top Ten Higne	est Priced Drugs

Drug Name	Indicated Use	Payer A Average Rate	Payer A Unique Rates	Payer B Average Rate	Payer B Unique Rates	Average Rate Difference
Onasemnogene	Gene therapy for					
Abeparvovec-Xioi	spinal muscular atrophy (SMA)	\$2,134,500	6	\$2,499,681	6	\$365,181
	Gene therapy for					
/oretigene Neparvovec-Rzyl	inherited retinal disease (IRD)	\$848,868	3	\$997,006	2	\$148,138
	CAR-T for certain types of leukemia					
Tisagenlecleucel	and lymphoma	\$457,425	1	\$596,469	2	\$139,044
	CAR-T for diffuse large B-cell					
Lisocabtagene Maraleucel	lymphoma (DLBCL)	\$385,894	6	\$481,511	2	\$95,618
	RNAi for					
Lumasiran	primary hyperoxaluria type 1	\$114,206	3	\$132,615	2	\$18,408
Autologous Cultured	Cellular therapy to repair					
Chondrocytes	damaged cartilage	\$52,209	9	\$59,093	3	\$6,883
	Radiopharmaceutical for					
Lutetium Lu 177 Dotatate	neuroendocrine tumors (NETs)	\$52,006	9	\$62,792	2	\$10,787
	GLP-2 analog for					
Teduglutide	short bowel syndrome (SBS)	\$49,436	2	\$50,207	2	\$771
	GnRH agonist for prostate cancer and					
Histrelin Acetate	central precocious puberty	\$46,345	8	\$52,794	2	\$6,449
	Monoclonal antibody for age-related					
Ranibizumab	macular degeneration	\$45,396	1	\$46,800	1	\$1,404

Figure 1: Average Negotiated Rate by **GPI-2 Category and Share of Rx Claims Volume**

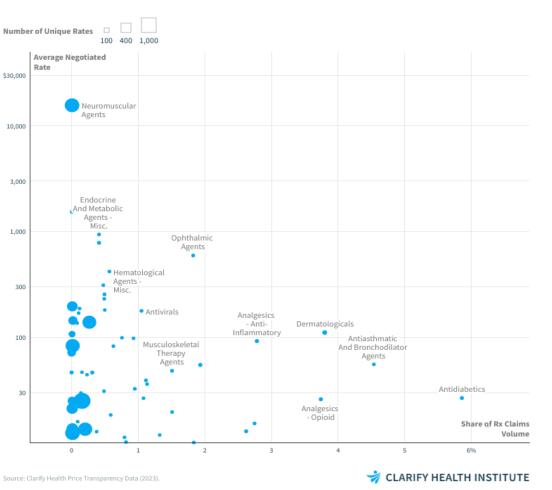
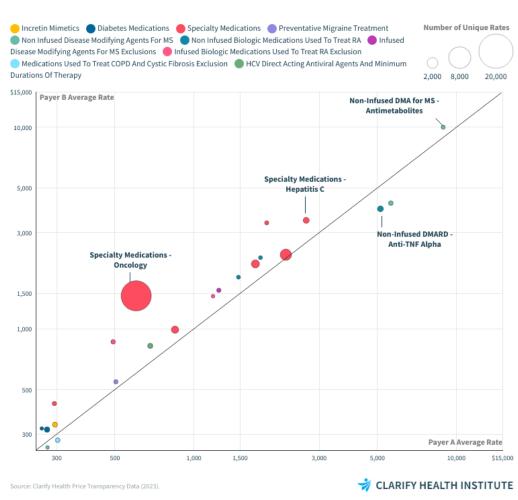


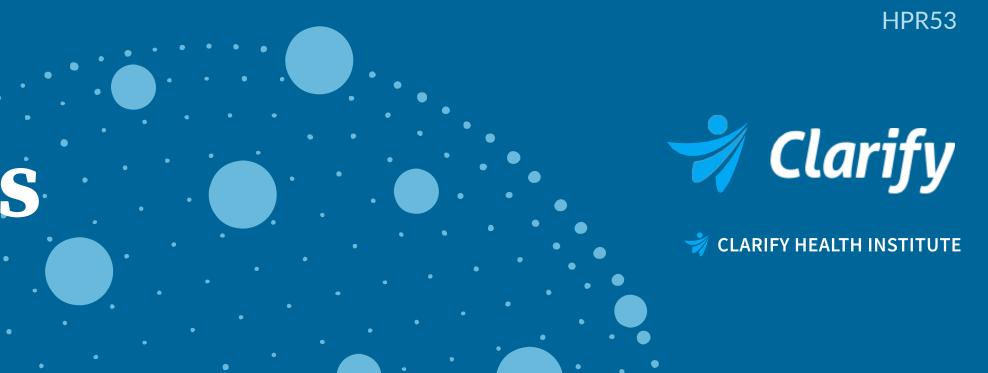
Figure 2: Payer A vs. Payer B Average Negotiated Rates by PQA Drug Category



References

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Results

Two national payers have released prescription drug rates, including commercially negotiated rates for 56,760 and 198,242 unique NDC codes respectively for Payer A and Payer B. Reflecting 345.6 million and 230.8 million negotiated rates, respectively, net pricing for a prescription drug averaged \$134 and \$640 and was widely distributed (standard deviation \$12,029 and \$32,429). For both payers, the top ten highest priced drugs consisted mainly of branded single and short-term (SST) therapies (see Table 1). These ten therapies have average negotiated rates ranging from \$45,396 to \$2.5 million. Negotiated rates for these therapies were consistently higher for one of the payers, with cross-payer differences ranging from \$771 to \$365,181.

Additional analyses aggregating to GPI-2 and PQA drug categories highlights the substantial variation across negotiated pricing. Figure 1 presents the weak negative correlation between negotiated rates and claims volume across GPI-2 categories. Figure 2 presents average pricing differences between the two payers by PQA category, again estimating lower average rates for Payer A for most therapeutic classes.

Conclusion

Prescription drug prices negotiated by payers are not yet required for release under the Transparency in Coverage regulations, but are nonetheless beginning to appear in publicly released data. Increased reporting efforts have the potential to inform the industry regarding historically concealed negotiated rates for prescription drugs, highlighting pricing tiers, cross-drug variation, and differences across payers.

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