

February 29, 2024

The Honorable Susan Donovan  
House Health & Human Services Committee  
Via email: [HouseHealthandHumanServices@rilegisature.gov](mailto:HouseHealthandHumanServices@rilegisature.gov)

**RE: H 7043 RELATING TO INSURANCE -- ACCIDENT AND SICKNESS INSURANCE POLICIES --  
INSURANCE COVERAGE FOR PREVENTION OF HIV INFECTION: Opposed**

Dear Chair Donovan and Members of the House Health & Human Services Committee:

Thank you for the opportunity to comment on H 7043. I represent Prime Therapeutics (Prime), a pharmacy benefit manager (PBM) owned by nineteen not-for-profit Blue Cross and Blue Shield Insurers, subsidiaries, or affiliates of those Insurers, including Blue Cross & Blue Shield of Rhode Island. Utilization management tools for the treatment of alcohol and opioid use disorders are put in place to ensure patient safety and to prevent misuse. For this reason, Prime opposes H 7043.

Prime helps people get the medicine they need to feel better and live well by managing pharmacy benefits for health plans, employers, and government programs including Medicare and Medicaid. Our company manages pharmacy claims for more than thirty million people nationally and offers clinical services for people with complex medical conditions. Our business model relies on transparency and advocating for simpler, lowest-net-cost pricing for drugs. Importantly, Prime is not focused on driving profit margins. To control costs, Prime's clients rely on our clinical expertise and drug utilization management tools.

Utilization management tools, such as prior authorization and step therapy, are put in place for prescription drugs that should be used only:

- for certain health conditions,
- have dangerous side effects,
- are harmful when combined with other drugs,
- may be misused or abused, or
- if there are equally affective drugs available at a more affordable cost.

The benefits of prior authorization apply to treatment of alcohol and opioid treatments. Buprenorphine for substance use disorder: Butrans® (buprenorphine) is an opioid indicated for the management of pain. Prior authorization should be applied to help ensure appropriate use per CDC guidelines and applicable state laws. The Food and Drug Administration (FDA) ranks drugs on their abuse rate -- on a scale of 1 to 5 -- and places them in "classes" or "schedules" with Class 1 being the highest risk for abuse and Class 5 being the lowest risk. Because Butrans received a FDA label designation as a Class 3 (CIII) drug, not a Class 2 (CII), some believe this product may be safer or less addictive than other opioids. However, there is insufficient data to support this claim.

Medication addiction therapies: Suboxone®, Zubsolv® and Sublocade™, which contain buprenorphine or a combination of buprenorphine and naloxone, are examples of medication addiction therapies. These drugs should be used as part of a complete treatment program that includes counseling and psychosocial support. Prime provides coverage of some formulations without restriction to help ensure appropriate access.

I urge the committee to consider the value of utilization management tools in ensuring patient safety. I welcome the opportunity to further discuss these concerns and work towards evidence-based solutions to help people get the medicine they need to feel better and live well. Thank you for your time and consideration.

Respectfully,

A handwritten signature in black ink that reads "Michelle Crimmins".

Michelle Crimmins

Government Affairs, Prime Therapeutics

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