

February 29, 2024

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

**RE: H 7625 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 7625. 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 human immunodeficiency virus (HIV) pre-exposure prophylaxis (PrEP) are put in place to ensure patient safety. PrEP drugs require frequent testing and monitoring to ensure that the medication is still safe for the patient to take. Removing the safety precaution of utilization management could be detrimental to the health of patients at risk of HIV exposure. For this reason, Prime opposes H 7625.

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 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.

HIV PrEP drugs may have utilization management tools in place because the drugs have a very specific use, and the risk of dangerous side effects increase if the patient becomes HIV positive. Removing the ability to have utilization management tools in place puts patients at risk.

While we understand the importance of PrEP and its high efficacy at preventing HIV infection in people who are at risk either based on sexual behaviors or injectable drug use, there are still safety precautions with these medicines that will be circumvented if this legislation passes.

**CDC recommended patient baseline assessments:**

- Does the patient already have HIV?
  - It is critical to exclude HIV positive patients because use of PrEP drugs in the early stages of HIV increase the patient's risk of develop drug-resistant HIV.
  - Patients with HIV may take medicines used in PrEP, but they must also take other antiretrovirals in order to have effective treatment for active disease.
- What type of sexual behaviors are the patients engaged in?

- There are some PrEP medicines that have not been studied in some patient types.
- Patients must be frequently tested/screened for all STDs.
- What are baseline cholesterol levels?
  - Cholesterol levels are impacted by these medicines.
- What is the baseline kidney function?
  - Kidney function is impacted by these medicines up to an including acute kidney failure.
  - Ongoing monitoring of kidney function important.
- Does the patient have active Hepatitis B virus (HBV)?
  - Patients with active HBV should be educated about the risks of stopping oral PrEP as it can result in a rebound of HBV replication leading to liver damage.

As you can see, these are extremely serious safety concerns. While we understand the goal of getting these medicines into the hands of as many people as possible in order to prevent HIV infection, we must not put patient safety at risk by removing important safety measures.

Additionally, it is important to recognize that these powerful medicines are used for other diseases such as active HIV infection and Hepatitis B which can have life-altering impacts if PrEP is not managed safely.

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,



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