



March 24<sup>th</sup>, 2026

The Honorable Susan Donovan  
The Honorable Joshua Giraldo  
Members, House Health and Human Services Committee  
Room 101 - State House  
82 Smith St.  
Providence, RI 02903

**RE: H 7539 RELATING TO INSURANCE – BENEFIT DETERMINATION AND UTILIZATION REVIEW ACT; Opposed**

Chair Donovan, Chair Giraldo and Members of the Committee:

The Pharmaceutical Care Management Association (PCMA) is the national association of America's pharmacy benefit managers (PBMs). We appreciate the opportunity to comment on H 7539.

**About PBMs**

PBMs are hired by employers, unions, government programs and others to drive down prescription drug costs and administer prescription drug plans for more than 289 million Americans. Before getting into specifics on H 7539, there are five things to know about PBMs:

- PBMs are the only part of the drug supply chain whose primary role is to lower prescription drug costs. On average, they save patients and families about \$1,154 per person each year.
- PBMs are extremely effective at reducing prescription drug costs for employers and patients, which is why some industries that profit from high drug prices oppose them.
- PBMs work for employers, unions, and government programs who have the ultimate say on what a drug benefit looks like. PBMs carry out the chosen plan by negotiating lower drug prices, processing claims, performing safety checks, and handling related services.
- For the enormous savings and value that PBMs provide, they operate on thin profit margins.
- Hiring a PBM is optional. Employers, unions, government programs, and others choose to use PBMs because they help lower drug costs and manage prescription benefits more efficiently.

**About H 7539**

PCMA has significant concerns with H 7539, which would drive up employer costs and more importantly put patients at risk. Many medications carry serious side effects, the potential for

Pharmaceutical Care Management Association  
325 7th Street, NW, 9th Floor  
Washington, DC 20004  
[www.pcmanet.org](http://www.pcmanet.org)



dangerous interactions, or a high risk of misuse. Step therapy and prior authorization processes ensure each patient receives the right medicine at the right time. Prior authorization is a tool to address those concerns and protect patients by ensuring a drug is reviewed for safety, necessity, and lower cost alternatives before coverage approval. Step therapy likewise promotes proven, cost-effective care by guiding patients to alternative safe, affordable treatments. H 7539 would strip away these essential tools that encourage clinically appropriate and cost-effective use.

Prior authorization and step therapy tools used by PBMs are designed by independent medical experts as part of the PBM's Pharmacy & Therapeutics (P&T) Committee. These committees develop evidence-based guidelines for appropriate use of prescription drugs. PBMs take these guidelines and work with insurers to craft health plans with the goal of securing savings and improving health outcomes. These plans also have appeals processes if the patient and their doctor disagree with the guidelines.

Utilization management tools, such as prior authorization and step therapy, are not only just good for patients, they also save money for employers. These safe use and adherence tools can reduce costs by as much as 50% through prior authorization and step therapy. Over 10 years, increased state-specific costs from restricting these tools could range from \$162 million (WY) to \$10.25 billion (CA)<sup>1</sup>. The US Federal Trade Commission, Government Accountability Office, and National Academy of Medicine all agree—these tools protect patients and help reduce costs<sup>2</sup>.

Instead of enacting H 7539 the legislature should put patients first.

H 7539 will raise costs and put the safety of patients at risk, without addressing the rising prices set by drug manufacturers. PCMA looks forward to working with members of the committee to address high drug prices while preserving tools that improve affordability and patient safety.

Sam Hallemeier

A handwritten signature in black ink, appearing to read "S. Hallemeier", is positioned above the contact information.

Pharmaceutical Care Management Association  
(202) 756-5727  
[shallemeier@pcmanet.org](mailto:shallemeier@pcmanet.org)

---

<sup>1</sup>Visante. 2023. "Increased Costs Associated with Proposed State Legislation Impacting PBM Tools," p. 26.

<sup>2</sup> National Academies of Sciences, Engineering, and Medicine (NASEM). 2017. "Making Medicines Affordable: A National Imperative"