



April 14<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 8382 AN ACT RELATING TO BUSINESS AND PROFESSIONS - PHARMACIES;  
Opposed**

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 8382.

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 8382, here are four 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.
- 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. PBMs negotiate lower drug prices, process claims, and perform safety checks.

About H 8382

PCMA opposes proposals that restrict the ability of PBMs to conduct pharmacy audits and identify cases of pharmacy fraud, waste, and abuse.

Comprehensive audits performed by PBMs are a crucial tool in combatting fraud, waste, and abuse to protect patients, employers, unions, retirees, government programs, and other health plan sponsors. Audits are required for virtually all government and private sector pharmacy benefit offerings, all of which are subject to contract requirements and government regulations. Recent studies estimate that provider and pharmacy fraud make up between 3-5% of total U.S. health care expenditures, amounting to tens of billions of dollars in financial losses. For

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pharmacies, fraud, waste, and abuse schemes are constantly evolving. Many recent examples exist of illegal kickback schemes or other methods of defrauding Medicaid and Medicaid, costing states and patients millions of dollars.

Where fraud, waste, or abuse has already occurred, audits help identify that activity and recover money improperly obtained by a pharmacy. Unfortunately, H 8382 significantly restricts a PBM's ability to audit, allowing rogue pharmacies to commit fraud and profit from fraudulent claims, while patients pay the price. In a time when the cost of health care continues to rise, it is more important than ever that fraudulent activity be prevented to keep these costs down.

H 8382 would prevent the ability of governments, employers, and labor unions to provide affordable and accessible prescription drug coverage for their employees and their families by limiting the tools used by PBMs to control health care costs, such as conducting audits to identify any fraud, waste, or abuse.

PCMA recognizes the intent behind the proposed legislation, and supports reasonable guardrails on pharmacy audits, including notice requirements, frequency of audits, limits for routine audits, prohibitions on the use of extrapolation when errors are found, and protecting pharmacies' ability to appeal negative findings. However, we strongly oppose any proposal that interferes with a PBM's ability to control health care costs.

Sam Hallemeier

A handwritten signature in black ink, appearing to read "Sam Hallemeier".

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