



March 26th, 2026

The Honorable Melissa Murray
The Honorable Pamela Lauria
Members, Senate Health and Human Services Committee
Senate Lounge
82 Smith St.
Providence, RI 02903

RE: S 2109 RELATING TO INSURANCE – BENEFIT DETERMINATION AND UTILIZATION REVIEW ACT; Opposed

Chair Murray, Chair Lauria 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 in opposition to S 2109.

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 S 2109, there 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 S 2109

S 2109 eliminates a carrier's ability to develop plan designs that lower costs for its members. Pharmacy networks managed by PBMs provide patients with a higher-quality, lower-cost pharmacy experience. To achieve this goal, PBMs require pharmacies to compete on service, price, convenience, and quality to be included in certain preferred networks. Pharmacies that agree to participate in such arrangements are designated as "preferred" and become members of that network.



Employers always decide how to design pharmacy benefits, and pharmacy networks are an important tool helping them provide their employees with affordable access to prescription drugs. This bill would essentially strip away the ability of employers, unions, and government programs to implement these cost measures. Restricting lower cost pharmacy network designs, as well as restricting the use of lower cost mail-order pharmacies, will raise costs and lower quality for both patients and payers. In addition to saving patients money, PBMs also monitor prescription drug safety across all of the network pharmacies, alerting pharmacists to potential drug interactions, even if a patient uses multiple pharmacies. Mail-order pharmacies have specialized clinical programs and staffed pharmacists trained in disease management and adherence programs that are designed to increase and improve the overall health of patients.

Instead of enacting S 2109 the legislature should put patients first.

S 2109 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 "Sam Hallemeier", written in a cursive style.

Sr. Director, State Affairs
shallemeier@pcmanet.org
(202) 756-5727