



April 16th, 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 2468 RELATING TO INSURANCE – BENEFIT DETERMINATION AND UTILIZATION REVIEW ACT; Opposed

Chair Murray, Vice 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 on S 2468.

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 2468, 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 S 2468

PCMA has significant concerns with S 2468, which would drive up employer costs and more importantly put patients at risk. Many medications carry serious side effects, the potential for 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,

Pharmaceutical Care Management Association
505 9th Street NW, 10th Floor
Washington, DC 20004
www.pcmanet.org



cost-effective care by guiding patients to alternative safe, affordable treatments. S 2468 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)¹. The US Federal Trade Commission, Government Accountability Office, and National Academy of Medicine all agree—these tools protect patients and help reduce costs².

Instead of enacting S 2468, the legislature should put patients first.

S 2468 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", is positioned above the contact information.

Pharmaceutical Care Management
(202) 579-7647
shallemeier@pcmanet.org

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

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