

April 7, 2022

The Honorable Tina Liebling, Chair Minnesota Health Finance and Policy Committee Minnesota House of Representatives

The Honorable Jennifer Schultz, Chair Minnesota Human Services Finance and Policy Committee Minnesota House of Representatives

Re: DE to HF 4706 - PBM Prescription Drug Substantial Public Interest Reporting

Chair Liebling, Chair Schultz, and members of the Committee:

Thank you for the opportunity to comment on HF 4706. I represent Prime Therapeutics, a pharmacy benefit manager (PBM) owned by 19 not- for-profit Blue Cross and Blue Shield insurers, subsidiaries or affiliates of those insurers, including Blue Cross and Blue Shield of Minnesota. Our Minnesota identity extends beyond our ownership and into the nearly 2,400 Minnesotans we employ.

HF 4706 has numerous provisions that will likely raise the cost of prescription drug benefits for Minnesotans. Respectfully, Prime concurs with the concerns and opposition raised by PCMA in their letter to the committee. For additional consideration, we would like to expand upon the concerns with Art. 6, Sec. 18. We appreciate the state's efforts to get a holistic view of the prescription drug supply chain and believe we are already doing our part in providing the necessary information pursuant to the existing reporting requirements in Minn. Stat. 62W. The additional reporting requirements outlined in Art. 6, Sec. 18 present significant concerns regarding highly sensitive proprietary data and how such data could be protected and used in the future.

At Prime, our business model is built on meaningful transparency – our plans and members have the information they need to help them get the medicine they need to feel better and live well. The provisions highlighted above and in the PCMA letter undercut our ability to accomplish that mission. We look forward to continuing to work with the committee on the above sections. Thank you for your time and consideration.

Sincerely,

Alex Sommer, J.D. Prime Therapeutics

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