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March 23, 2026

House Committee on Health and Human Services
State House
82 Smith Street
Providence, RI 02903

Re: Support HB 7947 – Copay Accumulator Adjustment Programs

Members of the House Health and Human Services Committee:

The Coalition of State Rheumatology Organizations (CSRO) supports **HB 7947,** which would require health plans to count third-party discounts and payments made on behalf of patients towards the patient's copayments, coinsurance, deductibles, or other out-of-pocket costs. CSRO serves the practicing rheumatologist and is comprised of over 40 state and regional professional rheumatology societies nationwide whose mission is to advocate for excellence in the field of rheumatology, ensuring access to the highest quality of care for the management of rheumatologic and musculoskeletal disease.

Rheumatologic diseases, such as rheumatoid arthritis, psoriatic arthritis and lupus, are systemic and incurable, but innovations in medicine over the last several decades have enabled rheumatologists to better manage these conditions. With access to the right treatment early in the disease, patients can generally delay or even avoid damage to their bones and joints, as well as reduce reliance on pain medications and other ancillary services, thus improving their quality of life.

Many rheumatologic patients are prescribed specialty drugs for chronic conditions after trying and failing all available lower-cost alternatives and are often prescribed multiple medications for several conditions. These specialty medications can be very expensive, and many patients would go without treatment if they did not have access to copay assistance. Copay assistance may be provided to the patient through "copay cards", furnished by manufacturers to help cover a patient's cost sharing as well as through non-profit foundations, which offer monetary assistance to patients.

Until recently, health plans would count the value of the card towards the patient's deductible. However, health insurers and pharmacy benefit managers now regularly use programs known as "copay accumulator adjustment programs." In Rhode Island, **50%** of individual health plans reviewed in 2025 include a copay accumulator adjustment program.[i] These programs allow the patient to continue using their copay card but do ***not*** allow the copay assistance to count towards the patient's deductible or maximum out-of-pocket limit, driving greater patient out-of-pocket costs. Unfortunately, these copay accumulator adjustment programs impact patients living with chronic conditions who require high-cost specialty medications, including rheumatic diseases, as well as patients who can only afford high-deductible health plans.

Through these accumulator programs, insurers pocket the value of the copay assistance, in addition to demanding the full deductible value from the patient. Many copay cards hit an annual limit, at which point the patient is often responsible for the full copay for

their medication if they have not met their plan's deductible or maximum out-of-pocket limit. Some patients may have cost-sharing responsibilities of $5,000 a month or higher for their specialty medications or to cover multiple medications to treat their chronic conditions. When faced with these high out-of-pocket costs, many patients may abandon their treatment plan, forcing stable patients to discontinue their treatments. This can result in disease progression, flare ups, increased steroid use, and even loss of effectiveness of their original therapy if eventually restarted. Managing the results from non-adherence to their medication requires the use of substantially more resources than allowing for continuity of care from the start.[ii]

It is important to note that the Federal Employer Health Benefits prohibits the use of copay accumulator programs, according to a January 2024 letter. In this letter by the Federal Office of Personnel Management, the Office explicitly states that it will, "decline any arrangements which may manipulate the prescription drug benefit design or incorporate any programs such as copay maximizers, copay optimizers, or other similar programs, as these types of benefit designs are not in the best interest of enrollees or the Government."[iii] We encourage the legislature to take a similar position on behalf of patients throughout Rhode Island.

Copay accumulator adjustment programs are harmful to patients and drive up patient out-of-pocket costs. As the legislature continues to consider opportunities to address the cost of medications for patients throughout Wisconsin, we encourage you to protect patients and support HB 7947. We thank you for your consideration and are happy to further detail our comments to the Committee upon request.

Respectfully,

Aaron Broadwell, MD, FACR
President
Board of Directors

Madelaine A. Feldman, MD, FACR
VP, Advocacy & Government Affairs
Board of Directors

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[i] The Aids Institute. "Our Loss, Their Gain: Copay Accumulator Adjustment Policies in 2025." February 2025.
[ii] Rheumatol Ther. "The Economic Benefit of Remission for Patients with Rheumatoid Arthritis." October 2022.
[iii] U.S. Office of Personnel Management Healthcare and Insurance. "Pharmacy Benefits Management (PBM) Transparency Standards." January 2024.