

**Gary Feldman, MD**  
President

June 12, 2024

**Madelaine Feldman, MD**  
VP, Advocacy & Government Affairs

Prescription Drug Affordability Board  
Colorado Division of Insurance  
Denver, CO 80202

**Michael Saitta, MD, MBA**  
Treasurer

### **Re: Drug Affordability Review**

**Aaron Broadwell, MD**  
Vice President & Secretary

The Coalition of State Rheumatology Organizations (CSRO) is comprised of nearly every active state rheumatology society in the nation, representing over 40 states, with a mission of advocating for excellence in the field of rheumatology, ensuring access to the highest quality of care for the management of rheumatologic and musculoskeletal disease. Our coalition serves the practicing rheumatologist. It is with this in mind that we write to you regarding the upcoming affordability review for Cosentyx.

**Erin Arnold, MD**  
Director

**Leyka Barbosa, MD**  
Director

**Kostas Botsoglou, MD**  
Director

### **Patient Out of Pocket Costs**

**Michael Brooks, MD**  
Director

CSRO monitored the affordability review process for Stelara, a drug utilized by many rheumatologists, and reviewed comments submitted to the board regarding its affordability. CSRO feels that some of the submissions, particularly those made by parties that rarely or never prescribe Stelara, did not accurately portray patients' typical out-of-pocket costs for the drug when copay assistance and cost defrayment strategies are taken into account. A figure of \$1400 was cited, but patients typically pay substantially less than that. Accordingly, as the affordability of Cosentyx is reviewed, CSRO feels it is important that the board is able consider what the typical out of pocket expense is for patients.

**Amish Dave, MD, MPH**  
Director

**Harry Gewanter, MD, MACR**  
Director

**Adrienne Hollander, MD**  
Director

**Firas Kassab, MD**  
Director

**Robert Levin, MD**  
Director

Copay assistance programs are designed to defray cost-sharing amounts charged to the patient by the plan for their prescription drug. These programs cover most or all of the patient's cost-sharing responsibility through a direct payment at the point of sale in order to enhance affordability for patients. As a result, it is the experience of rheumatologists, who frequently utilize Cosentyx in their practices, that patients will typically pay between \$0 to \$25 for the drug. The most common cost in this range is \$5. The copay assistance program for Cosentyx also helps defray costs associated with administration for the provider administered formulation, making the copay assistance program particularly generous. While a drug's cost in a vacuum may induce sticker shock, these costs are almost never what a patient actually pays for a drug at the end of the day. We hope the board finds this to be congruent with their prior determination that certain prescription drugs were in fact affordable.

**Amar Majjhoo, MD**  
Director

**Gregory Niemer, MD**  
Director

**Joshua Stolor, MD**  
Director

#### **EXECUTIVE OFFICE**

**Ann Marie Moss, MBA, CAE**  
Executive Director

It is important to note that many pharmacy benefit plans are utilizing a variety of programs, which undermine the effectiveness of manufacturer copay

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assistance programs. This increases the costs borne by patients, and may be itself a source of unaffordability.

We appreciate your consideration of our comments, and are happy to further detail our comments to the board.

Respectfully,



Gary Feldman, MD, FACR  
President  
Board of Directors



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