

# PUBLIC SUBMISSION

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Request for Information Regarding Reporting on Pharmacy Benefits and Prescription Drug Costs

**Comment On:** EBSA-2021-0005-0001

Request for Information: Reporting on Pharmacy Benefits and Prescription Drug Costs

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## General Comment

High prescription drug costs have been a prevalent issue over the years and it only seems to get worse. Promoting transparency within the healthcare system is a step in the right direction. Plans and issuers should be held accountable in meeting the statutory reporting obligations to the public. Our health care system does not currently have any type of transparency. Patients are often blindsided by the costs of prescription drug and health care services they are paying for. Likely, Doctors also seem to be unaware of the costs of prescription drugs or out-of-pocket costs. Pharmacy Benefit Managers, along with health issuers, pharmacies, drug manufacturers, and employers, however, seem to have all the up-to-date information that the public can benefit from. There should not be different considerations regarding data reporting by health insurance versus group health plans that would affect their ability to comply with the statutory reporting obligations. Plans and issuers should be required to make this information readily available online or by mail to allow a participant, beneficiary, or enrollee to obtain an estimate or understand out-of-pocket expenses and health care services. Some operational disadvantages of various reporting formats, such as Excel spreadsheets or fillable PDF forms, could be an issue as they are electronic and there could be technical difficulties. However, I believe that this is the most effective and efficient way to report information until a more advanced option is developed. The proposed rule will allow the public to make better informed decisions regarding their health care benefits.