



July 22, 2021

US Department of Labor
Office of Health Plan Standards and Compliance Assistance
Employee Benefits Security Administration
Attention: Request for Information Regarding Reporting on Pharmacy Benefits and
Prescription Drug Costs
200 Constitution Avenue NW, Room N-5653
Washington, DC 20210

Dear US Department of Labor:

Thank you for seeking a request for information on new reporting requirements and financial disclosures pertaining to pharmacy benefits and prescription drug costs. The Michigan Association of Health Plans (MAHP) represents a dozen different health plans operating in the State of Michigan and is pleased to provide the following comments.

MAHP members are dedicated to meaningful mechanisms that drive down the costs of prescription drugs for consumers and patients. Prescription drug costs represent the largest growing sector of overall health care costs for our member health plans. Our Association has been working with state leaders to address these concerns and is committed to finding innovative methods that reduce the escalating price of prescription drugs that will directly benefit consumers while still providing quality care.

However, the unprecedented financial disclosures and unattainable product specific price reporting being required of health plans under Section 204 of Title II of Division BB of the Consolidated Appropriations Act (CAA), is serious cause for concern that will not benefit consumers and patients. Compliance alone with these government-mandated new regulations and reports, especially those specifically related to manufacturer driven pharmaceutical product pricing, will lead to additional time and expense for health plans that could ultimately drive-up costs further on patients.

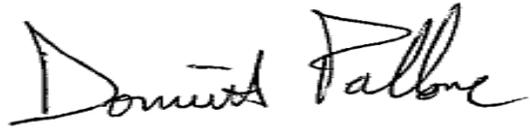
Additional data reporting at the level of detail identified in the rules would be impractical for our member health plans to collect and submit and would make compliance with these proposed rule sets nearly impossible. The level of data reporting on pharmaceutical products being sought demands additional entities be subject to disclosures to share information with health plans in order to comply.

If health plans are expected to report the data sets required on each plan sold, many of our members will be forced to produce thousands and thousands of reports. Consideration of

grouping such reports into various market and or product size unit, and for insurers that operate in multiple states, at the state level by legal entity, would be more desirable and less burdensome and costly.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Dominick Pallone". The signature is written in a cursive style with a large, stylized 'D' and 'P'.

Dominick Pallone
Chief Executive Officer, Michigan Association of Health Plans