

November 12, 2024



Numi Griffith, JD
Senior Policy Advisor
Division of Financial Regulation
Oregon Department of Consumer & Business Services
Email: Numi.L.Griffith@Oregon.gov

Dear Ms. Griffith:

Thank you for the opportunity to comment on HB4149 PBM Licensure Rulemaking Advisory Committee (RAC) proposed rules for 836-200-001 through 836-200-440 discussed during the October 30 RAC meeting.

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.

Prime Therapeutics is a trusted, truly transparent pharmacy solutions partner delivering savings, simplicity, and support to our customers (health plans, employers, and government programs including Medicare and Medicaid) and their members. Our purpose is to reimagine pharmacy solutions to provide the care we would want for our loved ones.

First, we wish to reiterate our understanding of DCBS's stated scope for these rules includes fully insured health plans and coordinated care organizations (CCO) in Oregon. Our understanding is these rules will NOT apply to self-insured Oregon-based health plans or Employee Retirement Income Security Act (ERISA) plans. It is also our understanding these rules will NOT apply to carriers who directly administer their pharmacy benefits.

Attached please find Prime's comments to the redline version of the proposed rules, questions for DCBS, and requested changes to the proposed rules for consistency with the legislative intent of HB4149.

- **Please note, yellow highlights were used to facilitate ease of identification of comments, requested changes, or queries.**

Please contact me at (505) 206-1089 with any questions.

Prime looks forward to working with DCBS and other stakeholders on the proposed rules. We look forward to the November 20 RAC meeting for further discussion.

Sincerely,

A handwritten signature in black ink that reads "LuGina Mendez-Harper, PharmD, RPh".

LuGina Mendez-Harper, PharmD, RPh
Pharmacist, State Government Affairs Principal

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