



May 1, 2026

Oregon Division of Financial Regulation
Oregon Prescription Drug Affordability Board
350 Winter St. SE
Salem, OR 97309

May 2026 Oregon PDAB meeting

RE: Patients, Caregivers, and Advocacy Groups: Ocrevus® and Ocrevus Zunovo™ comments

Members of the Oregon Prescription Drug Affordability Board:

Thank you for the opportunity to continue to submit comments to the Oregon Prescription Drug Affordability Board. The National Multiple Sclerosis Society (Society) is pleased that the State of Oregon and the Prescription Drug Affordability Board (Board) continues robust public outreach and comment solicitation throughout each step in this process. The Society will continue to be involved as we believe Boards such as these provide important information and transparency regarding the high cost of prescription medications. The Board and the Society share a common goal in ensuring affordable access to medications for all Oregon residents.

Patients, Caregivers, and Advocacy Groups

This letter aims to provide the patient advocacy group perspective the Board is endeavoring to collect from the Patient, Caregiver, and Advocacy Groups open survey, specifically related to the multiple sclerosis disease-modifying therapies (DMTs) Ocrevus® and Ocrevus Zunovo™.

Background

Multiple sclerosis (MS) is an unpredictable disease of the central nervous system. Currently there is no cure. Symptoms vary from person to person and may include disabling fatigue, mobility challenges, cognitive changes, and vision issues. Nearly 1 million people live with MS in the United States. While there is not yet a cure, we do know that early diagnosis and treatment are critical to minimizing disability. Significant progress is being made to achieve a world free of MS.

MS Disease-Modifying Therapies and Ocrevus® and Ocrevus Zunovo™

Today there are more than 20 DMTs, both name brand and generic, approved by the FDA for treatment of MS. Ocrevus® was approved by the FDA in 2017 with Ocrevus Zunovo™ following in 2025. Both are considered to be in the category of high efficacy treatments, and Ocrevus® was the first medication approved with the specific anti-CD20 mechanism of action. Both Ocrevus® and Ocrevus Zunovo™ target CD20-positive B cells. This anti-CD20 action is beneficial for people living with MS because it specifically reduces nerve damage which can lead to irreversible disability progression.

Of the more than 20 FDA approved DMTs for relapsing forms of MS, it's important to note that Ocrevus® and Ocrevus Zunovo™ are the only FDA approved DMT treatments for primary progressive MS (PPMS). Approximately ten to fifteen percent of people with MS have PPMS; these individuals can expect to



experience gradually worsening neurological symptoms and an accumulation of disability without relapses.

The most recent pricing data shows that as of January 2026, the annual price for Ocrevus® and Ocrevus Zunovo™ is \$86,857 (fig. 1). From our experience working with people living with MS, most patients do not differentiate between the cost of the DMT and the total cost of the infusion including provider fees, ancillary infusion costs, facility fees, etc. These additional costs are what patients see on their explanation of benefits and can put the total billed amount into the \$100-120,000 range. In analyzing the reported out-of-pocket costs, we would urge the Board to ensure that all cost reporting is accurate and clear on what out-of-pocket costs are related to the price of the drug and what costs are associated with administrative/infusion costs.

Costs of Living with MS

People with MS have a variety of healthcare needs including but not limited to addressing neurological symptoms; emotional and psychological issues; rehabilitation therapies to improve and maintain function and independence; and long-term care. These needs vary dramatically from person to person and can change year on year as the disease progresses. Prescription medications are central to most treatment regimes.

Due to the range of health care and associated needs, the average total cost of living with MS is calculated at \$88,487 per year.¹ MS may impact one's ability to work and can generate steep out-of-pocket costs related to medical care, rehabilitation, home & auto modifications, and more. For individuals with MS, medical costs are an average of \$65,612 more than for individuals who do not live with the disease. Disease-modifying therapies are the single largest component of these medical costs. As of January 2026, the median annual brand price of MS DMTs is nearly \$118,000. Seven out of the nine DMTs that have been on the market for at least 13 years are priced over \$100,000 annually and continue to see regular price increases (fig. 1).

Delays and Barriers to Care: Prior Authorization and Step-Therapy

Step therapy and prior authorizations are forms of utilization management that health plans may use as mechanisms to control the order in which patients take certain medications or the type of medication they can be prescribed. Step therapy protocols require that patients must try one or more medications selected by their insurer before the plan will grant coverage for the drug originally prescribed by the healthcare provider. If a physician prescribes a drug outside of the step-edit order, it may not be covered unless a drug on the step-edit order is tried and failed first. Prior authorizations require that physicians ask insurance companies before undertaking certain medical procedures or prescribing certain medications, often repeatedly for the same medication.

Prior authorization and step therapy are important tools to contain costs and ensure quality of care. However, they can often result in delayed treatment, abandonment of treatment, and higher

¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9109149/>



administrative burdens. For patients living with serious or chronic illnesses such as MS, prolonging ineffective treatment (and delaying access to the right treatment) may result in increased disease activity, loss of function, and possible irreversible accumulation of disability.

Following a diagnosis of relapsing MS, the initiation of treatment with an FDA-approved DMT is recommended as soon as possible. Movement from one DMT to another should occur only for medically appropriate reasons as determined by the treating clinician and patient.

Application Based, Time-Limited Patient Assistance Programs

Survey results show that nearly 2/3 (64%) of people with MS have relied on copay assistance or other support for their DMTs and 19% altered their treatment plans due to cost². It is reasonable to question the role of copay assistance programs and the potential role they inadvertently play in raising costs. However, until real solutions to the challenges of unaffordable MS DMTs and other prescription medications are found, application based, manufacturer patient assistance programs will continue to play a necessary and vital role in keeping these products accessible. Loss of this vital assistance would be devastating.

The Society's best estimates based on claims data is that from 2023-2024 almost 1,100 Oregonians living with MS utilized the DMT Ocrevus[®] or Ocrevus Zunovo[™]. This is out of an estimated MS population of just over 11,000, showing Ocrevus[®] and Ocrevus Zunovo[™] DMT usage representing approximately 10% of Oregonians living with MS³.

The National Multiple Sclerosis Society thanks the Board again for the opportunity to provide comments throughout the drug review process. Should you have any questions, please contact Seth Greiner, Assistant Director, Government Affairs, at seth.greiner@nmss.org.

Sincerely,

Seth Greiner
Assistant Director, Government Affairs
National Multiple Sclerosis Society

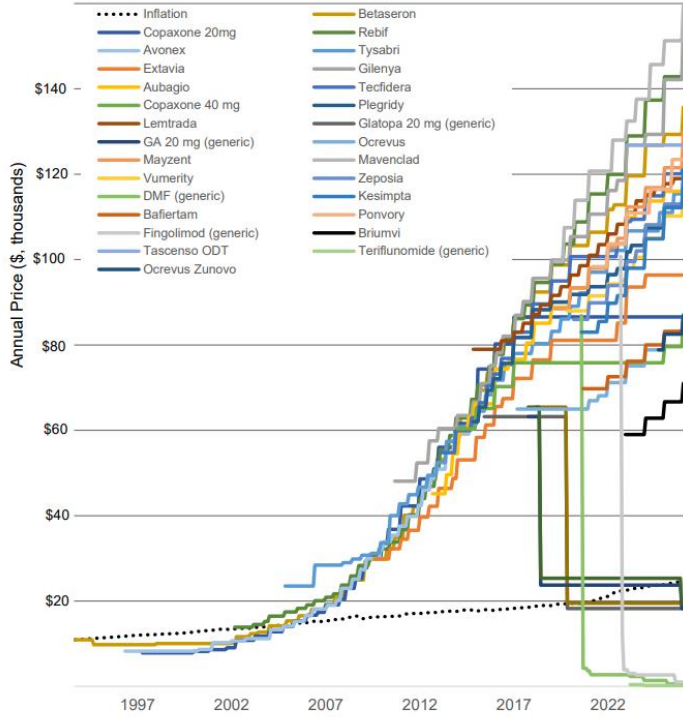
² Talente, B., Finseth, L. T., Blake, N., Costello, K., Schmidt, H., Vandigo, J., & Oehrlein, E. M. (2025). Patient Experiences with the Impacts of Multiple Sclerosis & Disease-Modifying Therapies. *ClinicoEconomics and Outcomes Research: CEOR*, 17, 199–215.

³ Komodo Health. (2025, April 29). *Oregon Ocrevus Multiple Sclerosis Utilization 2023-2024* [Data set]. Komodo Prism.



Figure 1

Trends in annual price for disease-modifying therapies for multiple sclerosis; 1993 to 2026



Notes:
 *2025 to 2026 (January) **Generic, lowest WAC reported
 DMF=dimethyl fumarate, GA=glatiramer acetate
 Annual price estimated from wholesale acquisition costs (First Databank)
 Dashed line is projected annual price of Betaseron assuming only inflationary increases in price (CPI)
 Lemtrada is based on four 12 mg vials (Package insert dosing: 12 mg/day (5 vials) for five consecutive days in first year; 12 mg/day (3 vials) for three days in year 2)
 Briumvi is based on maintenance dose of 450 mg (3 vials) twice a year.
 Updated 3.25.2026 (data through January 2026)

Drug (manufacturer; market entry)	1 Year Change*	Annual Price 2026
Interferons		
Betaseron (Bayer, July 1993)	4.9%	\$135,710
Avonex (Biogen, May 1996)	5.0%	\$117,906
Rebif (EMD Serono, Mar 2002)	4.0%	\$148,562
Extavia (Novartis, Aug 2009)	0.0%	\$96,373
Plegridy (Biogen, Aug 2014)	5.0%	\$117,906
Glatiramer Acetate		
Copaxone 20mg (Teva, Dec 1996)	0.0%	\$86,554
Copaxone 40 mg (Teva, Jan 2014)	9.4%	\$87,090
Glatopa 20 mg (generic, Apr 2015)	0.0%	\$18,250
Glatopa 40 mg (generic, Feb 2018)	0.0%	\$19,500
GA 20 mg (generic, Oct 2017)	-23.1%	\$18,250
GA 40 mg (generic, Oct 2017)	-23.1%	\$19,500
S1P Receptor Modulators		
Gilenya (Novartis, Sept 2010)	9.9%	\$156,228
Mayzent (Novartis, Mar 2019)	7.0%	\$130,020
Zeposia (BMS, March 2020)	4.5%	\$118,113
Ponvory (Janssen, March 2021)	6.0%	\$123,450
Tascenso ODT (Cycle, Jan 2023)	0.0%	\$126,813
Fingolimod (generic, Aug 2022)**	-63.7%	\$973
Fumarates		
Tecfidera (Biogen, Mar 2013)	5.0%	\$126,088
Vumerity (Biogen, Nov 2019)	4.8%	\$115,475
Bafiertam (Banner, Sept 2020)	4.0%	\$86,521
DMF (generic, Aug 2020)**	-58.2%	\$572
Other Oral DMT		
Aubagio (Sanofi, Sept 2012)	0.0%	\$115,981
Mavenclad (EMD Serono, Mar 2019)	5.4%	\$159,493
Teriflunomide (generic, Mar 2023)**	0.0%	\$214
Monoclonal Antibodies		
Tysabri (Biogen, Nov 2004)	4.0%	\$115,430
Lemtrada (Sanofi, Nov 2014)	1.0%	\$118,977
Ocrevus (Genentech, Mar 2017)	5.2%	\$86,857
Kesimpta (Novartis, Aug 2020)	8.0%	\$121,138
Briumvi (TG Therapeutics, Jan 2023)	6.5%	\$70,993
Ocrevus Zunovo (Genentech, Sept 2024)	5.2%	\$86,857

MS Society disclosure: The MS Society receives up-to-date drug price information twice a year through a contract with health economist/researcher Dr. Daniel Hartung, OHSU.