



August 4, 2026

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

RE: Prescription Drug Review, Ocrevus® and Ocrevus Zunovo™ comments, National MS Society

Members of the Oregon Prescription Drug Affordability Board:

Thank you for the opportunity to continue to submit comments on 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.

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 disease-modifying therapies (DMTs) - brand, generic, and biosimilar - approved by the FDA for treatment of MS. Ocrevus® was approved by the FDA in 2017 with Ocrevus Zunovo™ following in 2025. Evidence indicates that both are highly efficacious MS DMTs 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 and are the same medication with differing delivery systems to expand treatment options for people with MS. 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). Current research increasingly views MS as a single disease rather than distinct relapsing and progressive forms. People with MS can experience both progression biology, characterized by gradual worsening of disability over time, and relapsing biology, marked by clinical attacks, relapses, or new MRI lesions. People with MS may experience worsening due to progression or relapse biology at any point during their MS disease course.



The most recent pricing data shows that as of January 2026, the annual price for Ocrevus® and Ocrevus Zunovo™ is \$86,857.¹ 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 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 provision of the infusion/treatment, general administration, or other ancillary services.

Costs of Living with MS

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.² 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. These needs vary dramatically from person to person and can change year on year as the disease progresses. For individuals with MS, medical costs are an average of \$65,612 more than for individuals who do not live with the disease. DMTs 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 increases³. Prescription medications are central to most treatment regimes.

Current evidence demonstrates that Ocrevus and Ocrevus Zunovo are highly efficacious MS therapies which are widely used in the MS community to prevent accumulation of disability from relapses and progression.⁴ We again thank the Board 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

¹ National MS Society and Oregon Health & Sciences University, Trends in annual pricing for disease-modifying therapies for multiple sclerosis, updated January 2026, available upon request

² Bebo, B., Cintina, I., LaRocca, N., Ritter, L., Hartung, D., Ngorsuraches, S., Wallin, M., Yang, G. (2022) The Economic Burden of Multiple Sclerosis in the United States. *Neurology*. 2022 May 3;98(18):e1810-e1817.

³ National MS Society and Oregon Health & Sciences University, *Trends in annual pricing for disease-modifying therapies for multiple sclerosis*, updated January 2026, available upon request

⁴ <https://clinicaltrials.gov/study/NCT03500328#study-plan> and High-Efficacy Therapies for Treatment-Naïve Individuals with Relapsing–Remitting Multiple Sclerosis... and High-Efficacy Therapies for Treatment-Naïve Individuals with Relapsing–Remitting Multiple Sclerosis.