

March 5, 2026

VIA ELECTRONIC DELIVERY

Oregon Prescription Drug Affordability Review Board
Labor & Industry Building
350 Winter Street NE
Salem, OR 97309-0405

Care of: pdab@dcbs.oregon.gov

Re: Cosentyx[®] Affordability Review Report to the Legislature

Dear Oregon Prescription Drug Affordability Board (“Board”):

Novartis Services, Inc. submits this letter on behalf of Novartis Pharmaceuticals Corporation and its affiliates referred to collectively herein as “Novartis.” We appreciate the opportunity to comment on the Board’s draft 2025 Drug Review Report for the Oregon legislature¹ pursuant to its affordability review determination for Cosentyx[®] (secukinumab).

Novartis is an innovative medicines company concentrated on the core therapeutic areas of cardiovascular, immunology, neuroscience, and oncology. At Novartis, we are united by a single purpose to reimagine medicine to improve and extend lives so that patients, health care professionals and societies are empowered in the face of serious disease. Ensuring people everywhere can benefit from the latest medical breakthroughs is a shared global responsibility – one we care deeply about and work hard to uphold through our science, value and access initiatives, and government and community partnerships.

When we determine the prices for our medicines, we consider the value that these medicines provide to patients as well as health care systems and society at large. Changes in our 2026 list pricing of our medicines were primarily at or below the rate of inflation. When discounts and rebates to middlemen are factored in, on average, the net pricing of our medicines has decreased this year compared to last. Unfortunately, these savings often do not reach patients as intended.

Novartis respectfully disagrees with the Board’s conclusion that Cosentyx “may create affordability challenges for health care systems or high out-of-pocket costs” for Oregonians. We address each of the Board’s stated bases for its affordability determination below.

¹ OR PDAB, 2025 Drug Review Report for the Oregon Legislature, February 2026.
<https://dfr.oregon.gov/pdab/Documents/20260218-PDAB-document-package.pdf>

Affordability impact on the Oregon health care system

- *“More than \$74 million in gross prescription drug spending in Oregon” and “Wholesale acquisition cost increases averaging approximately 6.7 percent annually over multiple years.”*

The Board’s reliance on gross prescription drug spending and wholesale acquisition cost (WAC) trends does not provide an accurate measure of affordability. Gross spending and list prices reflect undiscounted figures that do not correspond to the actual costs borne by health plans, patients, or public programs.

In Oregon, as in the rest of the United States, pharmacy benefit managers (PBMs) and payers negotiate substantial rebates and other price concessions that significantly reduce the net price of Cosentyx. Patients and health plans rarely pay the list price of a medicine. Moreover, patients who choose to pay cash for Cosentyx can purchase it at a 55% discount through Cosentyx’s direct-to-patient platform.² Accordingly, conclusions drawn from gross spending or WAC trends risk overstating real-world costs and mischaracterizing affordability.

When adjusted for inflation, the average net price of Cosentyx declined between January 2018 and December 2023. Moreover, nearly half of the reported \$74 million in gross spending reflects utilization in public programs. Approximately one quarter of spending is attributable to Medicare (~\$17.5 million), which is outside the purview of the Board, and another quarter of spending reflects Medicaid utilization (~\$17.9 million), where statutory rebates and supplemental discounts result in net prices that are significantly discounted from list prices.³ These figures underscore that gross spending alone is not an indicator of excessive pricing or lack of affordability.

Finally, aggregate spending reflects utilization, not price in isolation. Spending growth may result from increased access to effective therapies for patients with serious, chronic diseases, rather than from unaffordable pricing. As discussed below, Cosentyx’s utilization reflects its established clinical role and therapeutic value.

- *“1,382 Oregonians using Cosentyx”*

The number of Oregonians using Cosentyx does not support a finding of unaffordability. To the contrary, high utilization figures suggest that patients can access Cosentyx, which would be unlikely if it posed widespread affordability barriers. Indeed, the Board’s Annual Report 2025 acknowledges that increasing utilization is driving increased spending on

² Cosentyx is Available Through a Direct-to-Patient Option. February 2026.
<https://www.cosentyx.com/all/treatment-cost/direct-to-patient>

³ OR PDAB, Cosentyx Affordability Review Report: Version 2.0.
<https://dfr.oregon.gov/pdab/Documents/Cosentyx.pdf>

Cosentyx in the state.⁴ Importantly, increased utilization of an effective therapy is largely believed to reduce downstream medical costs by preventing disease progression, hospitalizations, surgeries, and disability.

Cosentyx is a well-established biologic therapy with robust clinical evidence across multiple indications, including moderate-to-severe plaque psoriasis, psoriatic arthritis, ankylosing spondylitis, juvenile idiopathic arthritis, and hidradenitis suppurativa. Each time Cosentyx is approved for a new indication, utilization naturally grows as new patient populations have access to the treatment.

The PDAB's own affordability review report recognizes Cosentyx's demonstrated efficacy, citing pivotal randomized controlled trials showing statistically significant improvements in disease activity across key endpoints.⁵ For patients living with chronic, inflammatory conditions that can cause pain, disability, and diminished quality of life, access to effective treatment is essential. Utilization of Cosentyx reflects clinical appropriateness and therapeutic value.

- *“Substantial net cost to commercial payers after manufacturer rebates and discounts”*

As stated above, the average net price of Cosentyx declined when adjusted for inflation between January 2018 and December 2023.

Furthermore, under Oregon administrative rules, the Board must not consider the net cost of a drug in a silo when assessing affordability. It must also consider a drug's “relative financial effects on health, medical, or social services costs.” As noted above, Cosentyx treats multiple serious, lifelong inflammatory diseases that are associated with significant direct and indirect economic burden, including medical utilization, lost productivity, and disability. Effective disease control can reduce hospitalizations, specialist visits, emergency care, and long-term complications, generating value beyond the pharmacy benefit.

Affordability impact on patient out-of-pocket costs

- *“Annual patient out-of-pocket cost was approximately \$2,422”*

Novartis cautions against overreliance on aggregated out-of-pocket (OOP) figures derived from Oregon's All Payer All Claims (APAC) Reporting Program because it does not account for copay assistance programs available to patients. In many cases, the OOP amounts reflected in claims data are not ultimately borne by patients but are offset by manufacturer assistance programs designed to improve access and adherence.

⁴ OR PDAB, Annual Report 2025, December 2025.

<https://dfr.oregon.gov/pdab/Documents/20251217-PDAB-document-package.pdf>

⁵ OR PDAB, Cosentyx Affordability Review Report: Version 2.0.

<https://dfr.oregon.gov/pdab/Documents/Cosentyx.pdf>

Novartis offers a comprehensive suite of patient support programs for Cosentyx. In 2024, 72% of commercially insured Oregon patients using Cosentyx accessed the medicine with the help of a Novartis copay assistance program, which can reduce patient cost sharing to as little as zero dollars per month for eligible patients. Nationally, 84% of patients utilizing the copay assistance program paid \$0 OOP for their Cosentyx prescription as of 2024.⁶ These programs play a critical role in mitigating insurance-imposed cost sharing requirements and ensuring that patients can initiate and remain on therapy.

In addition, Novartis offers the Covered Until You're Covered program for eligible commercially insured patients who experience coverage delays or denials, providing Cosentyx at no cost for up to two years while coverage issues are resolved. For uninsured patients who meet income and eligibility criteria, the independent Novartis Patient Assistance Foundation provides medicines at no cost. Collectively, these programs substantially reduce real-world patient OOP exposure.

It is also notable that Cosentyx's annual patient OOP costs are lower than all therapeutic comparators included in its Affordability Review Report.⁷ This comparative context is essential to any assessment of patient affordability.

Conclusion

Affordability is a multifaceted concept that cannot be accurately assessed using gross spending, list prices, or utilization metrics alone. When evaluated holistically—considering net pricing, patient assistance programs, clinical value, and avoided downstream costs—the evidence does not support the conclusion that Cosentyx presents an affordability challenge for Oregonians.

We welcome the opportunity to answer any questions you may have about the information provided above. Please contact me at courtney.piron@novartis.com.

Sincerely,



Courtney Piron
Head, US Public Affairs

⁶ IQVIA Claim Data FY 2023, SP Dispense Data FY 2023.

⁷ OR PDAB, Cosentyx Affordability Review Report: Version 2.0.
<https://dfr.oregon.gov/pdab/Documents/Cosentyx.pdf>