sanofi

January 19, 2026

Via Electronic Mail
Oregon Prescription Drug Affordability Board
PO Box 14480
Salem, OR 97309
pdab@dcbs.oregon.gov

Re: January 21 continued Board review of insulin products

Dear Members of the Oregon Prescription Drug Affordability Board:

Sanofi appreciates the opportunity to submit comments to the Oregon Prescription Drug Affordability Board ("OR PDAB") regarding the Board's potential selection of certain insulin products for affordability reviews, pursuant to OAR 925-200-0010. We understand that the OR PDAB is considering whether to include one or more of Sanofi's insulin glargine products, including Lantus®, Toujeo®, and unbranded products, Insulin Glargine U-100 and Insulin Glargine U-300, in the subset list of prescription drug and insulin products for review. For the reasons described below, OR PDAB's consideration of Sanofi's insulin products is inappropriate and inconsistent with the goal of ORS 646A.694, which is to identify products that currently create affordability challenges for the health care system or high out-of-pocket costs for patients.

1. **The 2023 data is outdated and does not reflect the significant reductions in list prices and other market trends, which reduce Oregon's cost and spending metrics for Sanofi's insulins.**

To further our commitment to support patients directly at the pharmacy counter and accelerate the transformation of the U.S. insulin market, in January 2024, Sanofi reduced the list price of Lantus®, our most widely prescribed insulin in the United States, by 78%.[1] Additionally, beginning January 1, 2024, all commercially-insured patients who fill their Lantus® prescriptions at participating pharmacies have their out-of-pocket responsibility capped at $35 for a monthly supply. And as of January 1, 2026, Sanofi has broadly expanded eligibility for our Insulins Val*you* Savings

[1] In conjunction with this pricing action, Sanofi withdrew the lower priced, unbranded version of Lantus, Insulin Glargine U-100, from the market because the new list price for Lantus was below the list price of Insulin Glargine U-100. At that time, Sanofi also reduced the list price of our short-acting Apidra® (insulin glulisine injection) 100 Units/mL by 70%.

Program, through which patients can obtain a 30-day supply of all of their Sanofi insulins for $35, to all patients in the US with a valid prescription. The program, first created for people without health insurance, is now available to all Americans regardless of insurance status to further support affordable access to these critical medicines.[2] For additional information regarding the steps Sanofi took in 2024 to drive insulin affordability, please see our 2025 Pricing Principles Report.[3]

These numbers also do not reflect the significant reduction in out-of-pocket costs for seniors covered under Medicare Part D who use Sanofi insulins. Beginning in 2023, Medicare Part D plans are required to cap out-of-pocket costs for covered insulins, including Sanofi insulins, at $35 per month under the Inflation Reduction Act (IRA). Prior to the IRA, Sanofi voluntarily participated in the Centers for Medicare and Medicaid Services' (CMS') Senior Savings Model, through which Sanofi contributed enhanced discount payments that allowed patients enrolled in participating Part D plans to pay $35 or less for each 30-day prescription of a Sanofi insulin throughout the year.[4]

Although payers, including PBMs and government and private insurers, ultimately decide which medicines to cover, how much to reimburse dispensing pharmacies, and patients' out-of-pocket responsibility, Sanofi's pricing actions have reduced pharmacy reimbursement and out-of-pocket costs for these products. Unfortunately, although Sanofi continues to provide lower cost options to payers and PBMs, patients often do not realize the full cost savings because incentives within the health system drive health plans and middlemen to favor high list prices and larger rebates over lower priced options.

Taken together, the scope of these changes mean that the OR PDAB's 2023 data simply do not accurately reflect current patient out of pocket costs, utilization, and payer spending. At a minimum, the OR PDAB should not

---

[2] Sanofi US, *Sanofi expands patient affordability program by offering access to all its insulins for $35 per month in the US* (Sept. 26, 2025), https://www.news.sanofi.us/2025-09-26-Sanofi-expands-patient-affordability-program-by-offering-access-to-all-its-insulins-for-35-per-month-in-the-US.

[3] Sanofi 2025 Pricing Principles Report: Action Driving Insulin Affordability, *available at* https://www.sanofi.us/assets/dot-us/pages/images/our-company/Social-impact/responsible-business-values/pricing-principles/Sanofi-2025-Pricing-Principles-Report_Action-Driving-Insulin-Affordability.pdf.

[4] Centers for Medicare & Medicaid Services, *Part D Senior Savings Model*, CMS (last visited Jan. 9, 2026), https://www.cms.gov/priorities/innovation/innovation-models/part-d-savings-model.

consider including Sanofi's insulin products in an affordability review unless and until it can review current data that reflects these changes.

2. **Sanofi's insulin glargine products are highly utilized and affordable life-saving treatments for Oregon residents with diabetes.**

The inclusion of Sanofi's insulin products, like Lantus®, among the top gross spending products is presumably a result of the number of patients who rely on these insulin products – not their prices. As demonstrated by Oregon's own 2023 data,[5] Sanofi's insulin glargine products are not among the highest cost insulin products on a per prescription or per patient basis across multiple metrics, including overall costs, payer payments, and patient out-of-pocket costs. Indeed, healthcare providers and patients choose Sanofi's insulin glargine products because of their well-established clinical benefits and their affordability.

We are proud of the meaningful ways in which our products have transformed the standard of care for patients, from the introduction of Lantus®, which provided significant improvements in basal insulin levels, to the introduction of Toujeo®, a next generation basal insulin that more closely mimics the body's endogenous insulin secretions, among others. In addition to delivering meaningful innovation in the types of insulin available to patients, we are proud of the role we have played in transforming the patient experience through the development of devices to ease the daily burden of insulin administration, allowing for fewer injections and, in some cases, fewer refills and related patient copays.

We have coupled these clinical innovations with our progressive and industry-leading pricing principles, which reflect our commitment to sustainable pricing and transparency,[6] and a suite of innovative affordability programs to help people reduce their prescription medicine costs, regardless of their insurance status or income level. As a result, no Oregon patient has to pay more than $35 per month for their Sanofi insulin product.[7] Please also see the attached

---

[5] *See* Insulin Preliminary Data, Oregon PDAB Data Dashboard, *available at* https://app.powerbigov.us/view?r=eyJrIjoiOGM2YjhlMWUtNzE2OC00MmU1LTk2MjktYWUzZGMyNTNmZmQ1IiwidCI6ImFhM2Y2OTMyLWZhN2MtNDdiNC1hMGNlLWE1OThjYWQxNjFjZiJ9.

[6] *See* Sanofi 2025 Pricing Principles Report, *available at* https://www.sanofi.us/assets/dot-us/pages/images/our-company/Social-impact/responsible-business-values/pricing-principles/Sanofi-2025-Pricing-Principles-Report.pdf.

[7] Additional details regarding our programs are available at https://www.teamingupfordiabetes.com/sanofidiabetes-savings-program.

document from our 2025 Pricing Principles on Sanofi's actions to drive insulin affordability.[8]

Given these utilization and cost trends – even using 2023 data, Sanofi's insulin glargine products are not an appropriate target for the OR PDAB.

3. **The data the OR PDAB is relying on does not appear to take into account the significant rebates and other price concessions that Sanofi provides to payers.**

The "list price" of a medicine often receives the most attention in public discussions, but it does not reflect the price patients pay at the pharmacy counter, nor does it reflect the amount health insurance companies pay (or that Sanofi receives).

Sanofi provides significant discounts, rebates, and fees to different stakeholders across the healthcare value chain, including to payers and their pharmacy benefit managers ("PBMs"), to ensure our medicines are accessible to patients. Sanofi pays these price concessions to insurers (or their PBMs) after a medicine is dispensed to a patient so it is not captured in the "payer paid" amount. As a result, the "payer paid" and "overall spend" data have no relation to the net amount payers actually pay for Sanofi's insulin products.

OR PDAB clearly recognizes the importance of understanding net spend to its analysis as it has collected this data for non-insulin products.[9] OR PDAB should consider payer spend net of rebates for insulin products as well.

For these reasons, Sanofi respectfully requests that the Board remove Lantus®, Toujeo®, Insulin Glargine U100, and Insulin Glargine U300 from consideration for the subset list of insulin products. Further, any consideration of these products should and at a minimum take into account

---

[8] Sanofi 2025 Pricing Principles Report – Action Driving Insulin Affordability, *available at* https://www.sanofi.us/assets/dot-us/pages/images/our-company/Social-impact/responsible-business-values/pricing-principles/Sanofi-2025-Pricing-Principles-Report_Action-Driving-Insulin-Affordability.pdf.

[9] *See* Carrier Preliminary Data, including Carrier Spend Net of Rebate and Carrier Spend Net of Rebate per Enrollee, Oregon PDAB Data Dashboard, *available at* https://app.powerbigov.us/view?r=eyJrIjoiOGM2YjhlMWUtNzE2OC00MmU1LTk2MjktYWUzZGMyNTNmZmQ1IiwidCI6ImFhM2Y2OTMyLWZhN2MtNDdiNC1hMGNlLWE1OThjYWQxNjFjZiJ9. The 2023 insulin data from the Oregon All Payer All Claims Database (APAC) is gross and not net of rebates. *See* Insulin Data Process, Oregon Prescription Drug Affordability Board (Jan 2025), *available at* https://dfr.oregon.gov/pdab/Documents/Insulin-Data-Process-Documentation.pdf.

updated data on insulin products before proceeding with any insulin product review.

Please feel free to contact me at with any questions at carissa.kemp@sanofi.com or (208) 954-6330.

Sincerely,

Carissa Kemp
Lead, State Government Relations, Sanofi

Enclosure:

Sanofi 2025 Pricing Principles Report – Action Driving Insulin Affordability