



# Xolair<sup>®</sup>

## *(omalizumab)*

Version 1.0



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## Document version history

| Version     | Date       | Description      |
|-------------|------------|------------------|
| <b>v1.0</b> | 08/11/2026 | Original release |
|             |            |                  |

# Review summary

## Therapeutic alternatives<sup>1,2,3</sup>

**Xolair® (omalizumab)** has the following therapeutic alternatives: **Cinqair, Dupixent, Fasenra, Nucala, and Tezspire.**

*Table 1 Subject drug and therapeutic alternative information*

| Proprietary name            | Non-proprietary name    | Manufacturer         | Year approved | Number of patents | Patent date range | Exclusivity expiration | On the CMS drug Maximum Fair Price (MFP) list |
|-----------------------------|-------------------------|----------------------|---------------|-------------------|-------------------|------------------------|-----------------------------------------------|
| <b>Xolair<sup>4</sup></b>   | <i>omalizumab</i>       | Genentech & Novartis | 2003          | 8                 | 2025-2043         |                        | Yes (2028)                                    |
| <b>Cinqair<sup>5</sup></b>  | <i>reslizumab</i>       | Teva                 | 2016          |                   |                   |                        | No                                            |
| <b>Dupixent<sup>6</sup></b> | <i>dupilumab</i>        | Regeneron & Sanofi   | 2017          |                   |                   |                        | No                                            |
| <b>Fasenra<sup>7</sup></b>  | <i>benralizumab</i>     | AstraZeneca          | 2017          |                   |                   |                        | No                                            |
| <b>Nucala<sup>8</sup></b>   | <i>mepolizumab</i>      | GSK                  | 2015          |                   |                   |                        | No                                            |
| <b>Tezspire<sup>9</sup></b> | <i>tezepelumab-ekko</i> | Amgen & AstraZeneca  | 2021          |                   |                   |                        | No                                            |

<sup>1</sup>Approved Drug Products with Therapeutic Equivalence Evaluations | Orange Book. U.S. Food & Drug Administration. <https://www.fda.gov/drugs/drug-approvals-and-databases/approved-drug-products-therapeutic-equivalence-evaluations-orange-book>.

<sup>2</sup>Frequently Asked Questions on Patents and Exclusivity, U.S. Food & Drug Administration, Feb. 5, 2020. [https://www.fda.gov/drugs/development-approval-process-drugs/frequently-asked-questions-patents-and-exclusivity#What is the difference between patents a.](https://www.fda.gov/drugs/development-approval-process-drugs/frequently-asked-questions-patents-and-exclusivity#What%20is%20the%20difference%20between%20patents%20and%20exclusivity)

<sup>3</sup>Selected Drugs and Negotiated Prices. Centers for Medicare & Medicaid Services. <https://www.cms.gov/priorities/medicare-prescription-drug-affordability/overview/medicare-drug-price-negotiation-program/selected-drugs-and-negotiated-prices>.

<sup>4</sup>No exclusivity information was listed for Xolair. Purple Book Database of Licensed Biological Products. U.S. Food & Drug Administration. <https://purplebooksearch.fda.gov/>.

<sup>5</sup>No patent or exclusivity information was listed for Cinqair. Purple Book Database of Licensed Biological Products. U.S. Food & Drug Administration. <https://purplebooksearch.fda.gov/>.

<sup>6</sup>No patent or exclusivity information was listed for Dupixent. Purple Book Database of Licensed Biological Products. U.S. Food & Drug Administration. <https://purplebooksearch.fda.gov/>.

<sup>7</sup>No patent or exclusivity information was listed for Fasenra. Purple Book Database of Licensed Biological Products. U.S. Food & Drug Administration. <https://purplebooksearch.fda.gov/>.

<sup>8</sup>No patent or exclusivity information was listed for Nucala. Purple Book Database of Licensed Biological Products. U.S. Food & Drug Administration. <https://purplebooksearch.fda.gov/>.

<sup>9</sup>No patent or exclusivity information was listed for Tezspire. Purple Book Database of Licensed Biological Products. U.S. Food & Drug Administration. <https://purplebooksearch.fda.gov/>.

## Price history<sup>10,11</sup>

**Xolair (omalizumab)** rose at an **average annual rate of 4.9 percent** from 2019 to 2025.

- In the same time period, its therapeutic alternatives rose at these rates:
  - Cinqair: 3.4 percent
  - Dupixent: 4.8 percent
  - Fasenra: 3.0 percent
  - Nucala: 4.5 percent
  - Tezspire: 6.4 percent

Additionally, the average annual rate of Xolair exceeded inflation in **2020, 2023, 2024, and 2025**.

## Price concessions<sup>12</sup>

Based on data received from healthcare carriers, Xolair in 2024 had an **average gross spend of \$2,618 per claim**, while the **average net spend after discount was \$2,120 per claim**. Price concession per claim was reported to be **\$498**, resulting in an **average price concession of 19.0 percent per claim**.

## Cost to the payers<sup>13</sup>

*Table 2 2024 APAC payer annual total expenditure, claims, and cost per enrollee<sup>14</sup>*

| Proprietary name | No. of enrollees <sup>15</sup> | No. of claims | Total payer paid | Cost per enrollee, mean | Cost per claim, median |
|------------------|--------------------------------|---------------|------------------|-------------------------|------------------------|
| <b>Xolair</b>    | 901                            | 8,833         | \$19,477,477     | \$21,618                | \$2,113                |
| <b>Cinqair</b>   | <31 <sup>a</sup>               | 51            | \$103,731        | \$20,746                | \$1,710                |
| <b>Dupixent</b>  | 3,313                          | 26,974        | \$91,524,770     | \$27,626                | \$3,491                |
| <b>Fasenra</b>   | 346                            | 1,931         | \$8,937,627      | \$25,831                | \$5,279                |

<sup>10</sup> Medi-Span. Wolters Kluwer, 2025. <https://www.wolterskluwer.com/en/solutions/medi-span/medi-span>.

<sup>11</sup> Consumer Price Index. U.S. Bureau of Labor Statistics. <https://www.bls.gov/cpi/tables/supplemental-files/>.

<sup>12</sup> Based on data submitted to the Department of Consumer and Business Services (DCBS) by Oregon's commercial insurance carriers. The data call includes information about the cost of the drug before and after price concessions in the commercial market.

<sup>13</sup> Based on Oregon's 2024 All Payer All Claims (APAC) data across commercial insurers, Medicaid, and Medicare. APAC cost information is prior to any price concessions such as discounts or coupons. For more information regarding APAC data visit: <https://www.oregon.gov/oha/HPA/ANALYTICS/Pages/All-Payer-All-Claims.aspx>.

<sup>14</sup> The totals for amounts paid, costs, and claims are from both medical and pharmacy reporting.

<sup>15</sup> The number of enrollees is derived from unique individuals collected from APAC at the drug level. A single unique individual may occur across multiple lines of business, indicating that an enrollee can be counted for each claim line of business. As a result, this leads to the elevated enrollment numbers presented in Table 6, 9, and 10 as compared to other totals indicated in this report.

| Proprietary name | No. of enrollees <sup>15</sup> | No. of claims | Total payer paid | Cost per enrollee, mean | Cost per claim, median |
|------------------|--------------------------------|---------------|------------------|-------------------------|------------------------|
| Nucala           | 486                            | 4,486         | \$16,272,480     | \$33,482                | \$3,431                |
| Tezspire         | 148                            | 1,246         | \$4,372,689      | \$29,545                | \$3,941                |

## Cost to enrollees<sup>16</sup>

Table 3 2024 gross APAC annual enrollee out-of-pocket (OOP) cost<sup>17</sup>

| Proprietary name | Total paid by enrollee | OOP cost per enrollee, median | OOP cost per claim, mean | OOP cost per claim, median |
|------------------|------------------------|-------------------------------|--------------------------|----------------------------|
| Xolair           | \$1,823,093            | \$150                         | \$206                    | \$0                        |
| Cinqair          | \$15,943               | \$3,769                       | \$313                    | \$0                        |
| Dupixent         | \$5,228,915            | \$5                           | \$194                    | \$0                        |
| Fasenra          | \$479,424              | \$11                          | \$248                    | \$0                        |
| Nucala           | \$590,604              | \$0                           | \$132                    | \$0                        |
| Tezspire         | \$168,314              | \$2                           | \$135                    | \$0                        |

## Rubric considerations

Table 4 Rubric domains and scoring considerations

| Domain                                                         | Consideration                                                         |
|----------------------------------------------------------------|-----------------------------------------------------------------------|
| Number of APAC enrollees                                       | 901                                                                   |
| Price evaluation                                               | Average annual percent change in WAC of 4.9 percent from 2019 to 2025 |
| Price concessions                                              | 62.3% of claims received rebates or price concessions                 |
| System & payer costs                                           | \$19,477,477 gross payer paid                                         |
| Enrollee burden                                                | \$2,023 mean of APAC enrollee OOP annual cost                         |
| Equity impact                                                  | TBD                                                                   |
| Access restrictions such as prior authorization, etc.          | Yes                                                                   |
| Less expensive therapeutic alternative available               | Yes                                                                   |
| Stakeholder input identify affordability or financial concerns | No                                                                    |

<sup>16</sup> Based on Oregon's 2024 All Payer All Claims (APAC) data across commercial insurers and Medicare. APAC cost information is prior to any price concessions such as discounts or coupons. For more information regarding APAC data visit: <https://www.oregon.gov/oha/HPA/ANALYTICS/Pages/All-Payer-All-Claims.aspx>.

<sup>17</sup> Total patient out-of-pocket costs is the sum of reported copayments, coinsurances, and deductibles.

| Domain                                      | Consideration                                                                  |
|---------------------------------------------|--------------------------------------------------------------------------------|
| Patent expirations more than 18 months away | Yes (one patent expired as of Nov. 2025, and three are expiring in July 2028.) |
| Absent from the CMS MFP review list         | No                                                                             |

## Review background

This review incorporates supporting information from Medi-Span, FDA databases (e.g., Orange Book, Purple Book), and other publicly available data where applicable.

Two primary data sources inform this review: the Oregon All Payers All Claims (APAC) Reporting Program database and the Oregon commercial carrier data call. APAC aggregates claims data across all payer types in Oregon, including Medicaid, Medicare, and commercial plans, and presents gross cost estimates. In contrast, the data call reflects submissions from 11 commercial health insurers and reports primarily net costs after manufacturer rebates, PBM discounts, and other price concessions. As a result, APAC generally reflects larger total claims and cost figures due to broader reporting for more enrollees, while the data call offers insight into actual expenditures from private payers in the commercial market.

In 2023, APAC included data for approximately 3.5 million Oregonians. Approximately 27% of people in APAC had Medicare coverage, 33% of people had Medicaid coverage, and 39% of people had commercial coverage. APAC cannot require submission of claims and enrollment data from entities regulated under the Employee Retirement Income Security Act of 1974 (ERISA), so data for many self-insured plans are not included.<sup>18,19</sup> For these drug reviews, APAC data on people with Medicare coverage are limited to Medicare Advantage and Part D only and do not include claims for Traditional Medicare Part A or Part B.

In this review, cell values with enrollee counts derived from APAC data are suppressed to protect confidentiality when the cell has 30 or fewer individuals. In data tables, this is shown as “<31<sup>α</sup>” with the α (alpha) superscript indicating the exact value of the cell value has been suppressed to protect confidentiality. In some tables, secondary suppression is applied to cell values to prevent backward calculation of other suppressed values. Cells with secondary suppression are shown as a value range with a β (beta) superscript, such as “100-200<sup>β</sup>”.

<sup>18</sup> Oregon All Payer All Claims Database (APAC) Data User Guide. Version 1.1 updated Nov 19, 2025. [APAC-Data-User-Guide.pdf](#). The number of people represented in 2024 APAC data has not been published as of May 2026.

<sup>19</sup> For 2024, the DCBS Division of Financial Regulation reported that just under one million people in Oregon were enrolled in commercial health plans and slightly more than one million people in Oregon were enrolled in self-insured health plans. *2024 Quarterly enrollment report*, <https://dfr.oregon.gov/business/reg/reports-data/annual-health-insurance-report/Pages/health-ins-enrollment.aspx>, accessed June 1, 2026.

The 2026 Oregon commercial carrier data call included data from commercial health plans providing coverage for approximately 800,000 Oregonians based on claims in 2024.<sup>20</sup> The data call is limited to fully-insured plans that are regulated by the state and does not include coverage regulated under ERISA.

This review addresses the affordability review criteria to the extent practicable. Due to limitations in scope and resources, some criteria receive minimal or no consideration.

In accordance with OAR 925-200-**0020**, PDAB conducted affordability reviews on prioritized prescription drugs selected under OAR 925-200-**0010**. The board selected ten drugs and two insulin products for affordability review in 2026. The selection process emphasized brand-name products with substantial cost impact and excluded antivirals, toxoids, vaccines, and products with available therapeutic equivalents or biosimilars as of February 2026. The board also removed from consideration products reviewed in 2025 and determined to possibly have potential system- or patient-level cost implications. To ensure broad relevance across Oregon’s insured population, the board prioritized drugs reported by seven or more commercial health carriers.

For insulin products, the board focused on products with the highest end-of-year unit prices while excluding those with fewer than 100 covered enrollees. Insulin glargine products reviewed by the board in 2025 were also removed to maintain focus on products not yet evaluated. This approach ensured that the final selection aligned with statutory intent, reflected consistent application of rule-based selection factors, and supported a comprehensive assessment of products with meaningful affordability implications for Oregon’s health care system and patients.

[Visit the PDAB webpage](#) for more information about purpose and statutory authority of the Oregon Prescription Drug Affordability Board (PDAB).

## Drug information

*Table 5 Drug and FDA information<sup>21</sup>*

|                                                  |                                         |
|--------------------------------------------------|-----------------------------------------|
| <b>Drug proprietary name(s)</b>                  | <b>Xolair®</b>                          |
| <b>Non-proprietary name (active ingredients)</b> | <i>omalizumab</i>                       |
| <b>Manufacturer</b>                              | Genentech & Novartis                    |
| <b>Pharmacologic category</b>                    | Antiasthmatic and bronchodilator agents |

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<sup>20</sup> The number of people covered by plans reporting to the commercial carrier data call was estimated using 2024 insurer data reported in 2025 to the Oregon Drug Price Transparency Program which receives reports on state-regulated health insurance plans.

<sup>21</sup> Genentech, Inc. (2024). *Xolair (omalizumab) injection: Prescribing information* (Revision 2/2024). U.S. Food and Drug Administration. [https://www.accessdata.fda.gov/drugsatfda\\_docs/label/2024/103976s5245lbl.pdf](https://www.accessdata.fda.gov/drugsatfda_docs/label/2024/103976s5245lbl.pdf)



| Drug proprietary name(s)               | Xolair®                                                                                                                                                                                                                                                                                                                                                     |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Treatment                              | Treats allergic and inflammatory conditions in both adults and children: Moderate to severe persistent asthma; chronic rhinosinusitis with nasal polyps (CRSwNP); IgE-mediated food allergy; and chronic spontaneous urticaria (CSU).                                                                                                                       |
| Dosage strength                        | <ul style="list-style-type: none"> <li>• Injection: 75 mg/0.5 mL, 150 mg/mL, and 300 mg/2 mL solution in a single-dose prefilled syringe. (3)</li> <li>• Injection: 75 mg/0.5 mL, 150 mg/mL and 300 mg/2 mL in a single-dose prefilled autoinjector</li> <li>• For injection: 150 mg lyophilized powder in a single-dose vial for reconstitution</li> </ul> |
| Form/Route                             | Vial (150mg/vial)<br>Syringe (75mg/0.5mL; 150mg/mL; 300mg/2mL)                                                                                                                                                                                                                                                                                              |
| Physician administered                 | Yes                                                                                                                                                                                                                                                                                                                                                         |
| NDCs reviewed                          | 50242004062<br>50242004086<br>50242021401<br>50242021455<br>50242021501<br>50242021555<br>50242021586<br>50242022701<br>50242022755                                                                                                                                                                                                                         |
| First approved by the FDA              | 06/20/2003                                                                                                                                                                                                                                                                                                                                                  |
| Expedited forms of approval by the FDA | None listed                                                                                                                                                                                                                                                                                                                                                 |
| Designations under the Orphan Drug Act | No                                                                                                                                                                                                                                                                                                                                                          |

## Health equity considerations

*ORS 646A.694(1)(a) and OAR 925-200-0020 (1)(a) & (2)(a)(A-B). Limitations in scope and resources available for this statute requirement.*

Claims data from APAC was evaluated for health equity considerations related to utilization in Oregon. The analysis included line of business (payer type), race, ethnicity, and gender where available and evaluated member counts, claims numbers, insurer paid amounts, and enrollee out-of-pocket costs. Equity data analysis using APAC is preliminary with additional data cleaning underway as of June 8, 2026. Claim counts and other metrics may change in future updates with improved data cleaning.

Xolair claims were primarily **observed among commercial enrollees**. Median and average claim costs were reviewed to understand typical and overall impacts. Median enrollee costs were

generally similar across coverage categories, while average costs were higher in some groups, indicating a smaller number of higher-cost claims. Race, ethnicity, and gender information was included in the review; however, a substantial proportion of records were categorized as unknown, limiting interpretation of demographic differences.

*Table 6 2024 APAC claim and enrollee count by line of business*

| Line of business  | Claim count  | Enrollee count <sup>22</sup> | Claims per enrollee |
|-------------------|--------------|------------------------------|---------------------|
| <b>Commercial</b> | 5,188        | 580                          | 8.9                 |
| <b>Medicaid</b>   | 1,589        | 162                          | 9.8                 |
| <b>Medicare</b>   | 2,056        | 237                          | 8.7                 |
| <b>Total</b>      | <b>8,833</b> | <b>979</b>                   | <b>9.0</b>          |

*Table 7 2024 APAC cost by line of business*

| Line of business  | Total payer paid | Mean payer paid/claim | Median payer paid/claim | Total enrollee OOP <sup>23</sup> | Mean enrollee OOP/claim | Median enrollee OOP/claim |
|-------------------|------------------|-----------------------|-------------------------|----------------------------------|-------------------------|---------------------------|
| <b>Commercial</b> | \$11,622,624     | \$2,240               | \$2,303                 | \$1,517,099                      | \$292                   | \$0                       |
| <b>Medicaid</b>   | \$2,950,590      | \$1,857               | \$1,371                 | \$0                              | \$0                     | \$0                       |
| <b>Medicare</b>   | \$4,749,955      | \$2,310               | \$1,983                 | \$289,586                        | \$141                   | \$0                       |

*Table 8 2024 APAC mean and median insurer and enrollee out-of-pocket costs per claim, by race*

| Race                                 | Claims | Mean payer paid | Median payer paid | Mean enrollee OOP <sup>24</sup> | Median enrollee OOP |
|--------------------------------------|--------|-----------------|-------------------|---------------------------------|---------------------|
| <b>White</b>                         | 2,768  | \$2,107         | \$1,708           | \$140                           | \$0                 |
| <b>Black/African American</b>        | 105    | \$3,405         | \$2,651           | \$114                           | \$0                 |
| <b>American Indian/Alaska Native</b> | 40     | \$3,341         | \$1,371           | \$1                             | \$0                 |
| <b>Asian</b>                         | 95     | \$2,535         | \$1,365           | \$60                            | \$0                 |

<sup>22</sup> The number of enrollees is derived from unique individuals collected from APAC at the drug level. A single unique individual may occur across multiple lines of business, meaning that an enrollee can be counted for each claim line of business. As a result, the difference in enrollment numbers may be different as compared to other totals indicated in this report.

<sup>23</sup> Total patient out-of-pocket costs is the sum of reported copayments, coinsurances, and deductibles for all enrollees in a line of business.

<sup>24</sup> The mean only includes claims paid from commercial and Medicare enrollees. Medicaid enrollees had [\$]0 out-of-pocket costs.

| Race                             | Claims | Mean payer paid | Median payer paid | Mean enrollee OOP <sup>24</sup> | Median enrollee OOP |
|----------------------------------|--------|-----------------|-------------------|---------------------------------|---------------------|
| Native Hawaiian/Pacific Islander | 18     | \$1,591         | \$1,576           | \$0                             | \$0                 |
| Mix race                         | 262    | \$2,256         | \$2,642           | \$67                            | \$0                 |
| Other                            | 209    | \$2,435         | \$2,386           | \$112                           | \$0                 |
| Refused to answer                | 11     | \$2,845         | \$2,845           | \$0                             | \$0                 |
| Unknown                          | 5,325  | \$2,178         | \$2,209           | \$255                           | \$0                 |

Table 9 2024 APAC claim counts and enrollee counts, by ethnicity

| Ethnicity    | Claim count | Enrollee count       |
|--------------|-------------|----------------------|
| Hispanic     | 104         | <31 <sup>a</sup>     |
| Non-Hispanic | 3,661       | 300-400 <sup>b</sup> |
| Unknown      | 5,068       | 547                  |

Table 10 2024 APAC claim counts and enrollee counts, by gender

| Gender  | Claim count | Enrollee count |
|---------|-------------|----------------|
| Female  | 5,742       | 593            |
| Male    | 2,477       | 247            |
| Unknown | 614         | 61             |

## Residents prescribed

ORS 646A.694(1)(b) and OAR 925-200-0020(1)(b) & (2)(b). Data source from APAC.

Based on APAC, **901 enrollees filled prescriptions** for Xolair with **8,833 claims paid by payers** in 2024.<sup>25</sup>

## Price for the drug

ORS 646A.694(1)(c) and OAR 925-200-0020(1)(c) & (2)(e), (f), & (g). Data source from Medi-Span, APAC, and carrier data call.

This section examines the pricing dynamics of Xolair, drawing on multiple data sources to characterize its historical price trends and implications for affordability. It includes an analysis of the drug's wholesale acquisition cost (WAC) and the Oregon Actual Average Acquisition Cost (AAAC), compared to its therapeutic alternatives. Together, the data provides a comprehensive

<sup>25</sup> Number of 2024 enrollees in APAC database across commercial insurers, Medicaid, and Medicare. For more information regarding APAC data: <https://www.oregon.gov/oha/HPA/ANALYTICS/Pages/All-Payer-All-Claims.aspx>.

view of Xolair's list price trajectory and pharmacy acquisition costs, and the degree to which the list price impacts costs.

### Price history

WAC per 30-day supply was calculated with package and unit WAC from Medi-Span based on the most utilized NDC in APAC in 2024 and was reviewed as an indication of historic price trends for the drug. However, WAC does not account for discounts, rebates, or other changes to the drug's cost throughout the supply chain.

*Table 11 30-day supply for review drug and its therapeutic alternatives*

|                             | Xolair               | Cinqair <sup>26</sup> | Dupixent                  | Fasenra              | Nucala             | Tezspire             |
|-----------------------------|----------------------|-----------------------|---------------------------|----------------------|--------------------|----------------------|
| <b>Dosage and frequency</b> | 600 mg every 1 month | 210 mg every 1 month  | 300 mg every 2 weeks      | 30 mg every 2 months | 100 mg every month | 210 mg every 1 month |
| <b>30-day supply</b>        | 4 mL                 | 21 mL                 | 4 mL                      | 0.5 mL               | 1 mL               | 1.91 mL              |
| <b>Reference NDC</b>        | 50242021501          | 59310061031           | 00024591401               | 00310183030          | 00173089201        | 55513011201          |
| <b>Strength</b>             | 150 MG/ ML           | 10 MG/ ML             | 300 MG/ 2 ML (150 MG/ ML) | 30 MG/ ML            | 100 MG/ ML         | 210 MG/ 1.9 ML       |

*Table 12 Drug vs therapeutic alternatives for 2019-2025 WAC per 30-day supply<sup>27</sup>*

| Year                        | Xolair  | Cinqair | Dupixent | Fasenra | Nucala  | Tezspire |
|-----------------------------|---------|---------|----------|---------|---------|----------|
| <b>2019</b>                 | \$4,425 | \$1,957 | \$3,020  | \$2,448 | \$2,955 |          |
| <b>2020</b>                 | \$4,514 | \$1,997 | \$3,110  | \$2,522 | \$3,074 |          |
| <b>2021</b>                 | \$4,649 | \$2,077 | \$3,203  | \$2,598 | \$3,167 |          |
| <b>+2022</b>                | \$4,885 | \$2,161 | \$3,385  | \$2,675 | \$3,325 | \$3,633  |
| <b>2023</b>                 | \$5,226 | \$2,205 | \$3,588  | \$2,756 | \$3,581 | \$3,847  |
| <b>2024</b>                 | \$5,540 | \$2,293 | \$3,803  | \$2,838 | \$3,689 | \$4,161  |
| <b>2025</b>                 | \$5,891 | \$2,386 | \$3,993  | \$2,924 | \$3,837 | \$4,369  |
| <b>Avg. Annual % Change</b> | 4.9%    | 3.4%    | 4.8%     | 3.0%    | 4.5%    | 6.4%     |

<sup>26</sup> The 30-day supply for Cinqair is estimated with the assumed body weight of 70 kg.

<sup>27</sup> Medi-Span. Wolters Kluwer, 2025. <https://www.wolterskluwer.com/en/solutions/medi-span/medi-span>.

|                                       |       |       |       |       |       |  |
|---------------------------------------|-------|-------|-------|-------|-------|--|
| <b>% change 2019<br/>between 2025</b> | 33.1% | 21.9% | 32.3% | 19.4% | 29.9% |  |
|---------------------------------------|-------|-------|-------|-------|-------|--|

The WAC of Xolair was approximately **\$1472.76 per unit** at the end of 2025.<sup>28</sup> Between 2019-2025, the unit WAC increased at an average annual rate of **4.2 percent**, exceeding the general consumer price index (CPI-U) inflation rate in **2019-2020, 2022-2023, 2023-2024 and 2024-2025** (See Figure 1 and Table 13).<sup>29</sup>

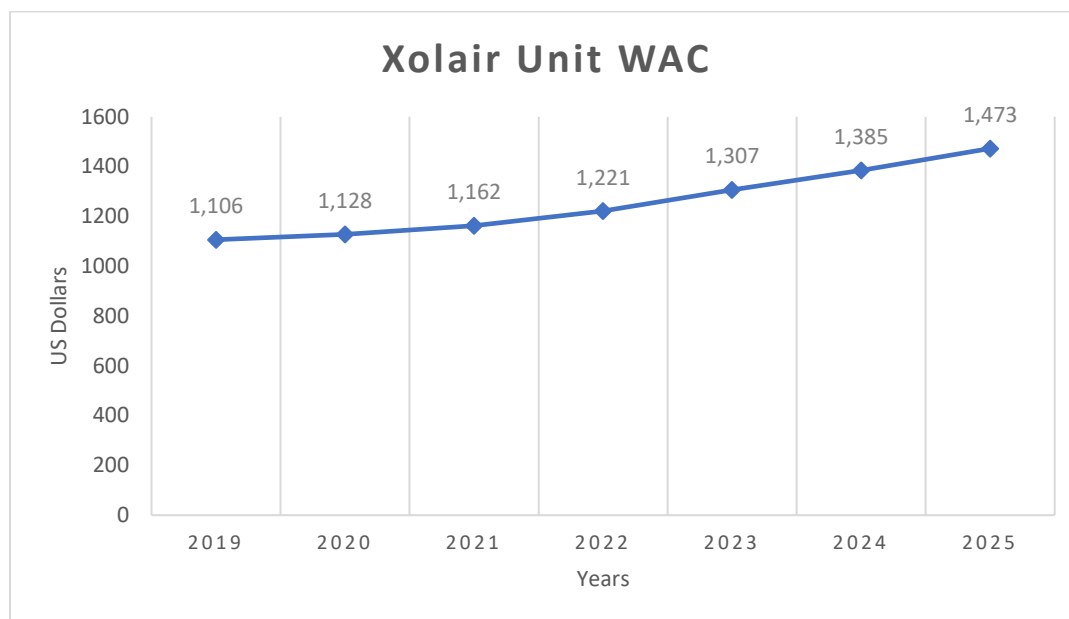


Figure 1 Unit WAC of most utilized NDC from 2019-2025

Table 13 Percent change of unit WAC of drug and therapeutic alternatives with CPI comparison<sup>30</sup>

| Years            | Xolair | Cinqair | Dupixent | Fasenra | Nucala | Tezspire | CPI-U |
|------------------|--------|---------|----------|---------|--------|----------|-------|
| <b>2019-2020</b> | 2.0%   | 2.0%    | 3.0%     | 3.0%    | 4.0%   |          | 0.7%  |
| <b>2020-2021</b> | 3.0%   | 4.0%    | 3.0%     | 3.0%    | 3.0%   |          | 5.3%  |
| <b>2021-2022</b> | 5.1%   | 4.0%    | 5.7%     | 3.0%    | 5.0%   |          | 9.0%  |
| <b>2022-2023</b> | 7.0%   | 2.0%    | 6.0%     | 3.0%    | 7.7%   | 5.9%     | 3.1%  |

<sup>28</sup> Ibid.

<sup>29</sup> Consumer Price Index. U.S. Bureau of Labor Statistics. <https://www.bls.gov/cpi/tables/supplemental-files/>.

<sup>30</sup> Percentages might differ from Table 12 as Table 13 percentages are based on unit WAC only.

| Years     | Xolair | Cinqair | Dupixent | Fasenra | Nucala | Tezspire | CPI-U |
|-----------|--------|---------|----------|---------|--------|----------|-------|
| 2023-2024 | 6.0%   | 4.0%    | 6.0%     | 3.0%    | 3.0%   | 8.2%     | 3.0%  |
| 2024-2025 | 6.3%   | 4.0%    | 5.0%     | 3.0%    | 4.0%   | 6.4%     | 2.7%  |

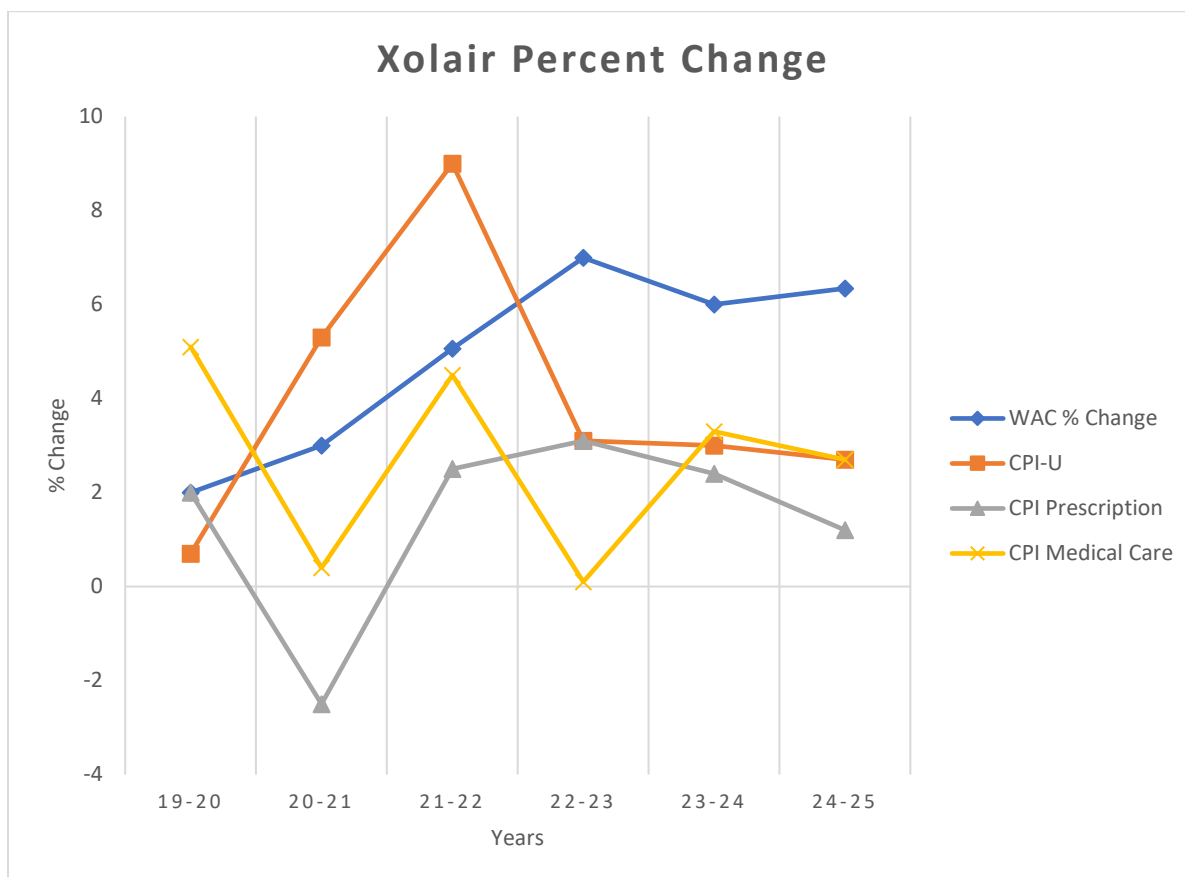


Figure 2 Year over year change in WAC compared to inflation rates<sup>31</sup>

## Maximum Fair Price

Xolair have been selected by the Centers for Medicare & Medicaid Services (CMS) for inclusion in the **Medicaid Drug Price Negotiation Program** for the **Initial Price Applicability Year 2028**.<sup>32</sup> As a negotiation-eligible drug, Xolair will be subject to a **Maximum Fair Price (MFP)** beginning **January 1, 2028**. CMS will establish an MFP that reflects the maximum amount Medicaid will pay for the drug and is intended to reduce beneficiary out-of-pocket costs and overall program spending.

<sup>31</sup> Consumer Price Index. U.S. Bureau of Labor Statistics. <https://www.bls.gov/cpi/tables/supplemental-files/>.

<sup>32</sup> Centers for Medicare & Medicaid Services (CMS). *Medicare Drug Price Negotiation Program: Top 50 Negotiation-Eligible Drugs for Initial Price Applicability Year 2028*. Published June 2024. Available at: <https://www.cms.gov/files/document/factsheet-medicare-top-50-negotiation-eligible-drug-list-ipay-2028.pdf>.



## Estimated average monetary price concession

ORS 646A.694(1)(d) and OAR 925-200-0020(1)(d) & (2)(d) & (2)(L)(A-B). Data source information provided from data call.

This section provides an analysis of the average monetary discounts, rebates, and other price concessions applied to Xolair claims in the commercial market. Drawing on 2024 data submitted through the carrier data call, it evaluates the extent to which these concessions reduced gross drug costs and estimates the average net costs to payers after adjustments. The analysis includes claim-level data on the proportion of claims with applied discounts, and the breakdown of the total concession amounts by type, offering insight into the reduced costs provided through manufacturer, PBM, and other negotiated price reductions.

Based on carrier-submitted data for 2024, the **average gross annual cost of Xolair per enrollee in the commercial market was approximately \$17,871**. After accounting for manufacturer rebates, pharmacy benefit manager (PBM) discounts, and other price concessions, the **mean net cost per enrollee declined to approximately \$14,473**, reflecting an **estimated mean discount of 19.0 percent** relative to gross costs.

Across all reporting carriers and market segments, the **total cost of Xolair before concessions was nearly \$1.2 million**, with total reported **price concessions amounting to approximately \$56,278**, as detailed in Table 15. Notably, **62.3 percent of claims benefited from some form of price concession**, leaving **81.0 percent at full gross cost**.

Table 14 Net cost price concessions estimate based on carrier submitted 2024 data

|                                                       |              |
|-------------------------------------------------------|--------------|
| Total number of enrollees                             | 664          |
| Total number of claims                                | 4,533        |
| Total number of claims with price concessions applied | 2,825        |
| Percentage of claims with price concessions applied   | 62.3%        |
| Percentage of cost remaining after concessions        | 81.0%        |
| Percentage of discount                                | 19.0%        |
| Manufacturer price concessions for all market types   | \$1,198,350  |
| PBM price concessions for all market types            | \$56,278     |
| Other price reductions for all market types           | \$1,001,323  |
| Cost before price concessions across all market types | \$11,866,242 |
| Total price concessions across all market types       | \$2,255,951  |
| Cost after price concessions across all market types  | \$9,610,291  |



|                                                  |          |
|--------------------------------------------------|----------|
| Mean cost per enrollee without price concessions | \$17,871 |
| Mean cost per enrollee with price concessions    | \$14,473 |

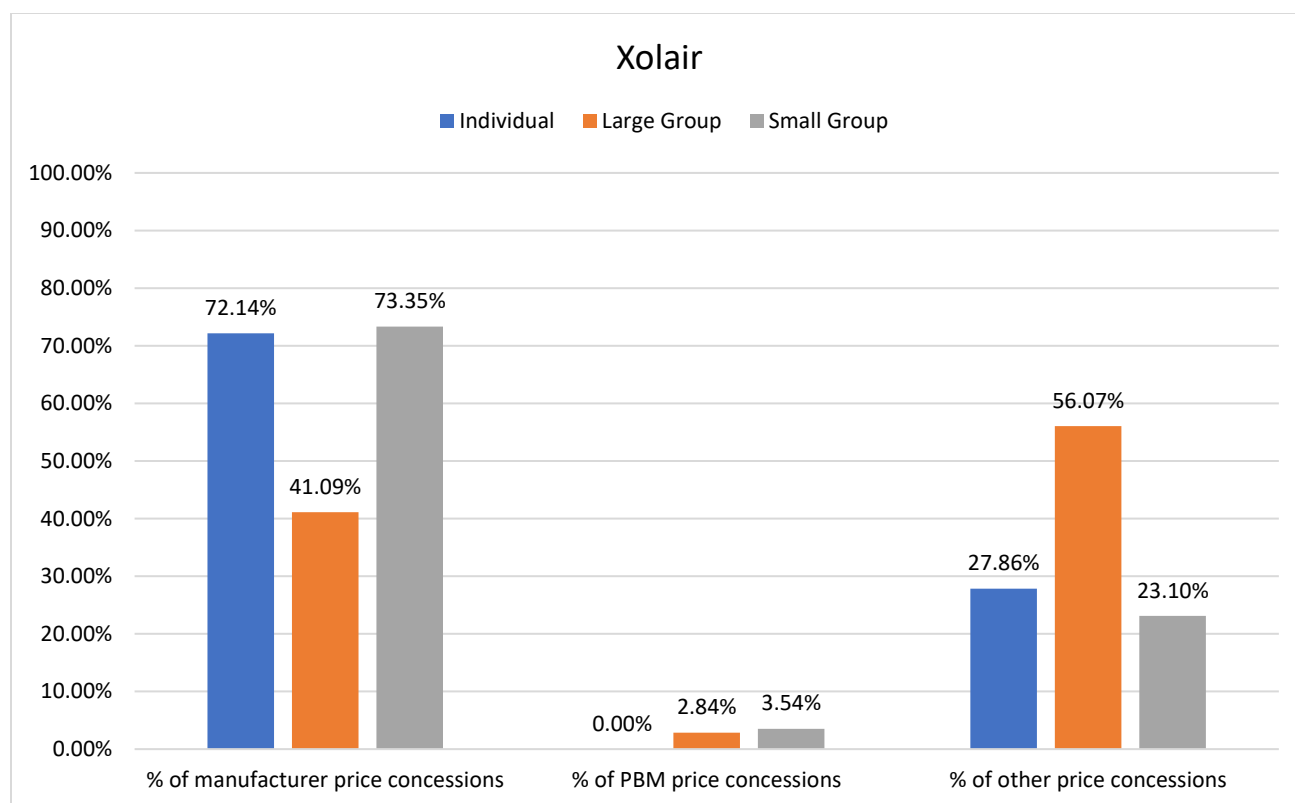
Including all market segments, the **gross average spend** of Xolair **per claim for commercial carriers was \$2,618 before any discounts, rebates, or other price concessions**. The **net cost per claim after** discounts, rebates, and other price concessions was **\$2,120**, meaning that insurers reported a price concession of **\$498** per claim on the initial drug cost as shown in Table 16.

*Table 15 Mean price concessions across market types from data call<sup>33</sup>*

|                                    | Mean    | Individual market | Large group | Small group |
|------------------------------------|---------|-------------------|-------------|-------------|
| <b>Spend per claim, gross</b>      | \$2,618 | \$2,329           | \$2,656     | \$2,685     |
| <b>Spend per claim, net</b>        | \$2,120 | \$1,625           | \$2,200     | \$2,180     |
| <b>Price concessions per claim</b> | \$498   | \$704             | \$456       | \$504       |
| <b>Percent discount</b>            | 19.0%   | 30.2%             | 17.2%       | 18.8%       |

Figure 4 shows manufacturer concessions comprised the largest share, supplemented by PBM discounted price arrangements and other adjustments across the payer types.

<sup>33</sup> Based on data submitted to the Department of Consumer and Business Services (DCBS) by Oregon's commercial insurance carriers.



The statutory and regulatory criteria calls for consideration of such information to the extent practicable. However, due to limitations in available evidence and reporting, this analysis was not performed. Future reviews may incorporate this data as it becomes available through improved reporting or additional disclosures from manufacturers, PBMs, and payers.

## Estimated price for therapeutic alternatives<sup>36</sup>

ORS 646A.694(1)(f) and OAR 925-200-0020(1)(f), (2)(c) & (2)(m). Data source information provided from APAC.

This section presents information on the estimated spending associated with Xolair and its therapeutic alternatives using 2024 data from APAC. APAC data reflects gross spending across Medicare, Medicaid, and commercial health plans in Oregon. The therapeutic alternatives are represented using APAC data, which does not reflect price concession or rebates.

Xolair’s gross total payer spend, based on APAC data, was nearly **\$19.5 million**. Among its therapeutic alternatives, **Dupixent** has the **highest gross total payer spend at \$91.5 million**. **Dupixent** also has the **greatest number of claims at 26,974 compared with 8,833 claims for Xolair**. **Cinqair** has the **lowest payer-paid amount per claim at \$2,034**, while **Fasenra** has the **highest at \$4,628**.

Within its therapeutic class for Xolair, **Dupixent** has the **highest total enrollee-paid amount at \$5.2 million**. **Cinqair** has the **highest enrollee-paid amount per claim at \$313**, while **Nucala** has the **lowest at \$132**.

Neither the drug nor its therapeutic alternatives are listed by the FDA as being in shortage, so availability is assumed to be unaffected.

Table 16 APAC average healthcare and average enrollee OOP costs for Xolair vs therapeutic alternatives<sup>37</sup>

| Proprietary name | No. of enrollees | No. of claims | Total payer paid | Total enrollees paid <sup>38</sup> | Payer paid/claim | Enrollee paid/claim <sup>39</sup> |
|------------------|------------------|---------------|------------------|------------------------------------|------------------|-----------------------------------|
| Xolair           | 901              | 8,833         | \$19,477,477     | \$1,823,093                        | \$2,205          | \$206                             |
| Cinqair          | <31 <sup>a</sup> | 51            | \$103,731        | \$15,943                           | \$2,034          | \$313                             |

<sup>36</sup> The definition of therapeutic alternative is a drug product that contains a different therapeutic agent than the drug in question, but is FDA-approved, compendia-recognized as off-label use for the same indication, or has been recommended as consistent with standard medical practice by medical professional association guidelines to have similar therapeutic effects, safety profile, and expected outcome when administered to patients in a therapeutically equivalent dose. [ORS 925-200-0020\(2\)\(c\)](#).

<sup>37</sup> The therapeutic alternative information is based on 2024 Oregon APAC data across commercial insurers, Medicaid, and Medicare. APAC cost information is prior to any price concessions such as discounts or coupons. <https://www.oregon.gov/oha/HPA/ANALYTICS/Pages/All-Payer-All-Claims.asp>.

<sup>38</sup> The cost includes all lines of business.

<sup>39</sup> Ibid.

| Proprietary name | No. of enrollees | No. of claims | Total payer paid | Total enrollees paid <sup>38</sup> | Payer paid/claim | Enrollee paid/claim <sup>39</sup> |
|------------------|------------------|---------------|------------------|------------------------------------|------------------|-----------------------------------|
| Dupixent         | 3,313            | 26,974        | \$91,524,770     | \$5,228,915                        | \$3,393          | \$194                             |
| Fasenra          | 346              | 1,931         | \$8,937,627      | \$479,424                          | \$4,628          | \$248                             |
| Nucala           | 486              | 4,486         | \$16,272,480     | \$590,604                          | \$3,627          | \$132                             |
| Tezspire         | 148              | 1,246         | \$4,372,689      | \$168,314                          | \$3,509          | \$135                             |

## Estimated average price concession for therapeutic alternatives

ORS 646A.694(1)(g) and OAR 925-200-0020(1)(g) & (2)(d) & (2)(L)(A-B). Limitations in scope and resources available for this statute requirement.

This section provides an analysis of the average monetary discounts, rebates, and other price concessions applied to the therapeutic alternatives identified for Xolair. Based on 2024 data submitted through the carrier data call, it evaluates the extent to which these concessions reduced gross drug costs and estimates the average net costs to payers after adjustments. The analysis includes claim-level data on the proportion of claims with applied discounts, and the breakdown of the total concession amounts by type, offering insight into the reduced costs provided through manufacturer, PBM, and other negotiated price reductions.

Table 18 shows the **average gross cost of the therapeutic alternatives per enrollee in the commercial market with Nucala having the highest cost at approximately \$35,796 and Fasenra at the lowest with \$23,704**. After accounting for manufacturer rebates, pharmacy benefit manager (PBM) discounts, and other price concessions, the **average net spend per enrollee for Nucala was approximately \$25,974** reflecting an **estimated mean discount of 19.6 percent** relative to gross costs.

Across all reporting carriers and market segments, the highest gross spend for a therapeutic alternative was **Dupixent at around \$41.5 million**, with total reported **price concessions amounting to approximately \$12.5 million**. Notably, **30.1 percent of claims benefited from some form of price concession**.

*Table 17 Table Net cost estimate for therapeutic alternatives based on carrier submitted 2024 data*

|                                                       | Cinqair | Dupixent | Fasenra | Nucala | Tezspire |
|-------------------------------------------------------|---------|----------|---------|--------|----------|
| Total number of enrollees                             | 0       | 1,455    | 58      | 133    | 59       |
| Total number of claims                                | 0       | 10,559   | 305     | 1,035  | 380      |
| Total number of claims with price concessions applied | 0       | 9,240    | 250     | 896    | 213      |

|                                                         | Cinqair | Dupixent     | Fasenra     | Nucala      | Tezspire    |
|---------------------------------------------------------|---------|--------------|-------------|-------------|-------------|
| Percentage of claims with price concessions applied     | 0.0%    | 87.5%        | 82.0%       | 86.6%       | 56.1%       |
| Percentage of cost remaining after concessions          | 0.0%    | 69.9%        | 80.5%       | 72.6%       | 85.2%       |
| Percentage of discount                                  | 0.0%    | 30.1%        | 19.6%       | 27.4%       | 14.8%       |
| Manufacturer price concessions for all market types     | \$0     | \$7,303,437  | \$227,718   | \$830,750   | \$131,007   |
| PBM price concessions for all market types              | \$0     | \$986,282    | \$18,182    | \$62,264    | \$20,057    |
| Other price reductions for all market types             | \$0     | \$4,179,879  | \$22,962    | \$413,199   | \$100,346   |
| Cost before price concessions across all market types   | \$0     | \$41,457,391 | \$1,374,849 | \$4,760,810 | \$1,702,876 |
| Total price concessions across all market types         | \$0     | \$12,469,598 | \$268,861   | \$1,306,214 | \$251,410   |
| Cost after price concessions across all market types    | \$0     | \$28,987,793 | \$1,106,499 | \$3,454,596 | \$1,451,465 |
| Avg. payer spend per enrollee without price concessions | \$0     | \$28,493     | \$23,704    | \$35,796    | \$28,862    |
| Avg. payer spend per enrollee with price concessions    | \$0     | \$19,923     | \$19,078    | \$25,974    | \$24,601    |

Including all market segments, **Nucala** had the highest **gross average spend per claim at \$4,600** before any discounts, rebates, or other price concessions. The net cost per enrollee after discounts, rebates, and other price concessions was **\$3,338**, meaning that insurers reported a price concession of **\$1,262** per claim on the initial drug cost as shown in Table 19.

*Table 18 The average price concessions per claim across market types from data call for identified therapeutic alternatives<sup>40</sup>*

| Cinqair                     | Mean | Individual market | Large group | Small group |
|-----------------------------|------|-------------------|-------------|-------------|
| Spend per claim, gross      | \$0  | \$0               | \$0         | \$0         |
| Spend per claim, net        | \$0  | \$0               | \$0         | \$0         |
| Price concessions per claim | \$0  | \$0               | \$0         | \$0         |
| Percent discount            | 0.0% | 0.0%              | 0.0%        | 0.0%        |

| Dupixent                    | Mean    | Individual market | Large group | Small group |
|-----------------------------|---------|-------------------|-------------|-------------|
| Spend per claim, gross      | \$3,926 | \$3,652           | \$4,013     | \$3,884     |
| Spend per claim, net        | \$2,745 | \$2,255           | \$2,913     | \$2,625     |
| Price concessions per claim | \$1,181 | \$1,398           | \$1,100     | \$1,259     |
| Percent discount            | 30.1%   | 38.3%             | 27.4%       | 32.4%       |

| Fasenra                     | Mean    | Individual market | Large group | Small group |
|-----------------------------|---------|-------------------|-------------|-------------|
| Spend per claim, gross      | \$4,508 | \$4,146           | \$4,524     | \$5,209     |
| Spend per claim, net        | \$3,628 | \$3,428           | \$3,687     | \$3,951     |
| Price concessions per claim | \$880   | \$718             | \$838       | \$1,258     |
| Percent discount            | 19.5%   | 17.3%             | 18.5%       | 24.2%       |

| Nucala                      | Mean    | Individual market | Large group | Small group |
|-----------------------------|---------|-------------------|-------------|-------------|
| Spend per claim, gross      | \$4,600 | \$3,795           | \$5,025     | \$3,518     |
| Spend per claim, net        | \$3,338 | \$2,473           | \$3,776     | \$2,281     |
| Price concessions per claim | \$1,262 | \$1,322           | \$1,249     | \$1,236     |
| Percent discount            | 27.4%   | 34.8%             | 24.9%       | 35.1%       |

| Tezspire                    | Mean    | Individual market | Large group | Small group |
|-----------------------------|---------|-------------------|-------------|-------------|
| Spend per claim, gross      | \$4,481 | \$4,032           | \$4,673     | \$4,322     |
| Spend per claim, net        | \$3,820 | \$3,572           | \$3,884     | \$3,827     |
| Price concessions per claim | \$662   | \$459             | \$789       | \$494       |
| Percent discount            | 14.8%   | 11.4%             | 16.9%       | 11.4%       |

<sup>40</sup> Based on data submitted to the Department of Consumer and Business Services (DCBS) by Oregon's commercial insurance carriers.

## Estimated costs to health insurance plans

ORS 646A.694(1)(h) and OAR 925-200-0020(1)(h) & (2)(h) & (m). Data source information provided from APAC and data call.

This section quantifies the aggregate financial impact of Xolair on health insurance plans in Oregon, based on claims and expenditure data from APAC and the 2024 carrier data call. Costs are delineated by payer type—including commercial plans, Medicaid, and Medicare—as well as by market segment within the commercial plans. These estimates highlight the distribution of expenditures across different types of health coverage and inform assessments of the drug’s budgetary implications for public and private payers.

In 2024, the Oregon APAC database recorded **8,833 total claims for Xolair among 901 total enrollees**, corresponding to a **total payer expenditure of nearly \$19.5 million**.

Table 20 provides gross cost estimates by the total APAC payer spend across all lines of business:

- **Commercial** accounted for the **largest share of claims at 5,188**, with a **total spend of nearly \$11.7 million**, and had the **highest number of enrollees at 580**.

*Table 19 Estimated 2024 APAC total annual gross payment, total enrollees and total claims<sup>41</sup>*

| Payer line of business     | Total enrollees | Total claims | Total payer paid    | Percent of total payer spend by LOB |
|----------------------------|-----------------|--------------|---------------------|-------------------------------------|
| <b>Commercial</b>          | 580             | 5,188        | \$11,652,130        | 59.8%                               |
| <b>Medicaid</b>            | 162             | 1,589        | \$2,960,361         | 15.2%                               |
| <b>Medicare</b>            | 237             | 2,056        | \$4,864,986         | 25.0%                               |
| <b>Totals<sup>42</sup></b> | <b>901</b>      | <b>8,833</b> | <b>\$19,477,477</b> |                                     |

Table 21 provides claims information for the healthcare system for Xolair and its therapeutic alternatives, distinguished by lines of business. Among Xolair’s therapeutic alternatives, **Dupixent** has higher **total claims of 26,974**, with **commercial showing to have the most claims at 15,655**.

<sup>41</sup> Based on 2024 Oregon APAC data across commercial insurers, Medicaid, and Medicare. APAC cost information is prior to any price concessions such as discounts or coupons.

<sup>42</sup> The total number of enrollees is the summation of enrollees across all markets which differs from the unique enrollees at the drug level.

Table 20 Estimated APAC payer 2024 claims of review drug and its therapeutic alternatives<sup>43</sup>

| Proprietary name | Commercial claims | Medicaid claims | Medicare claims | Total claims <sup>44</sup> |
|------------------|-------------------|-----------------|-----------------|----------------------------|
| <b>Cinqair</b>   | 0                 | 21              | 30              | <b>51</b>                  |
| <b>Dupixent</b>  | 15,655            | 5,902           | 5,417           | <b>26,974</b>              |
| <b>Fasenra</b>   | 736               | 577             | 618             | <b>1,931</b>               |
| <b>Nucala</b>    | 1,655             | 1,490           | 1,341           | <b>4,486</b>               |
| <b>Tezspire</b>  | 454               | 467             | 325             | <b>1,246</b>               |

Table 22 shows the overall payer expenditure of Xolair’s therapeutic alternatives, distinguished by lines of business. Among the therapeutic alternatives Dupixent had the most **expenditure at \$91.5 million** with **commercial being the biggest portion at \$49.5 million**.

Table 21 Estimated 2024 APAC payer annual gross expenditures of the review drug and its therapeutic alternatives from all lines of business<sup>45</sup>

| Proprietary name | Commercial expenditure | Medicaid expenditure | Medicare expenditure | Total <sup>46</sup> |
|------------------|------------------------|----------------------|----------------------|---------------------|
| <b>Cinqair</b>   | \$0                    | \$18,346             | \$85,385             | <b>\$103,731</b>    |
| <b>Dupixent</b>  | \$49,448,727           | \$21,641,744         | \$20,434,299         | <b>\$91,524,770</b> |
| <b>Fasenra</b>   | \$3,329,766            | \$2,572,357          | \$3,035,504          | <b>\$8,937,627</b>  |
| <b>Nucala</b>    | \$6,793,082            | \$4,558,458          | \$4,920,940          | <b>\$16,272,480</b> |
| <b>Tezspire</b>  | \$1,718,446            | \$1,367,472          | \$1,286,771          | <b>\$4,372,689</b>  |

Table 23 compares the overall payer cost per enrollee of Xolair and its therapeutic alternatives, distinguished by lines of business. Among the therapeutic alternatives, **Nucala has the highest mean cost per enrollee at \$33,482**, compared to **Xolair’s mean cost per enrollee at \$21,618**.

<sup>43</sup> Based on 2024 Oregon APAC data across commercial insurers, Medicaid, and Medicare. APAC cost information is prior to any price concessions such as discounts or coupons.

<sup>44</sup> Total is the sum of all claims for the drug across all lines of business.

<sup>45</sup> Based on 2024 Oregon APAC data across commercial insurers, Medicaid, and Medicare. APAC cost information is prior to any price concessions such as discounts or coupons.

<sup>46</sup> Total is the sum of all expenditure for the drug across all lines of business.



Table 22 Estimated 2024 APAC payer annual gross cost per enrollee of the review drug and its therapeutic alternatives<sup>47</sup>

| Proprietary name                                     | Xolair   | Cinqair  | Dupixent | Fasenra  | Nucala   | Tezspire |
|------------------------------------------------------|----------|----------|----------|----------|----------|----------|
| <b>Commercial cost/enrollee</b>                      | \$20,090 | \$0      | \$26,177 | \$21,482 | \$34,659 | \$26,851 |
| <b>Medicaid cost/enrollee</b>                        | \$18,274 | \$4,586  | \$26,169 | \$19,787 | \$24,640 | \$23,177 |
| <b>Medicare cost/enrollee</b>                        | \$20,527 | \$28,462 | \$22,308 | \$22,485 | \$26,315 | \$27,378 |
| <b>Mean<sup>48</sup> cost/enrollee</b>               | \$21,618 | \$20,746 | \$27,626 | \$25,831 | \$33,482 | \$29,545 |
| <b>Median, Cost/enrollee</b>                         | \$15,912 | \$17,493 | \$24,137 | \$24,579 | \$28,726 | \$28,050 |
| <b>Inter-quartile range (IQR)</b>                    | \$23,621 | \$12,002 | \$28,013 | \$23,864 | \$31,706 | \$40,337 |
| <b>Cost per enrollee, 75<sup>th</sup> percentile</b> | \$28,707 | \$20,464 | \$38,999 | \$34,716 | \$41,773 | \$48,157 |
| <b>Cost per enrollee, 95<sup>th</sup> percentile</b> | \$69,632 | \$45,239 | \$65,823 | \$63,097 | \$95,814 | \$59,772 |

Table 23 Estimated 2024 APAC payer annual gross cost per claim of the review drugs

| Proprietary name                                  | Xolair  | Cinqair | Dupixent | Fasenra | Nucala  | Tezspire |
|---------------------------------------------------|---------|---------|----------|---------|---------|----------|
| <b>Commercial cost/claim</b>                      | \$2,246 | \$0     | \$3,159  | \$4,524 | \$4,105 | \$3,785  |
| <b>Medicaid cost/claim</b>                        | \$2,246 | \$874   | \$3,667  | \$4,458 | \$3,059 | \$2,928  |
| <b>Medicare cost/claim</b>                        | \$2,246 | \$2,846 | \$3,772  | \$4,912 | \$3,670 | \$3,959  |
| <b>Cost per claim, mean</b>                       | \$2,205 | \$2,034 | \$3,393  | \$4,628 | \$3,627 | \$3,509  |
| <b>Cost per claim, median</b>                     | \$2,113 | \$1,710 | \$3,491  | \$5,279 | \$3,431 | \$3,941  |
| <b>IQR</b>                                        | \$2,112 | \$3,021 | \$1,109  | \$1,580 | \$1,248 | \$1,131  |
| <b>Cost per claim, 75<sup>th</sup> percentile</b> | \$2,798 | \$3,493 | \$3,743  | \$5,674 | \$3,689 | \$4,345  |

<sup>47</sup> Based on 2024 Oregon APAC data across commercial insurers, Medicaid, and Medicare. APAC cost information is prior to any price concessions such as discounts or coupons.

<sup>48</sup> The overall mean cost per enrollee across commercial insurers, Medicaid, and Medicare.

| Proprietary name                            | Xolair  | Cinqair | Dupixent | Fasenra | Nucala   | Tezspire |
|---------------------------------------------|---------|---------|----------|---------|----------|----------|
| Cost per claim, 95 <sup>th</sup> percentile | \$5,484 | \$4,446 | \$6,656  | \$6,608 | \$10,847 | \$4,689  |

Data for plan year 2024 submitted via the carrier data call further stratifies commercial expenditures by market segment. The collected **total net cost from reporting market types was around \$9.6 million**, with payers paying **\$9 million**, and **enrollees out-of-pocket estimated to be \$580,000**.

*Table 24 Estimated 2024 annual total net costs to the healthcare system, payers and OOP/enrollee<sup>49</sup>*

| Market       | Number of claims | Number of enrollees | Total net annual spending | Total annual payer paid | Total annual enrollee out-of-pocket cost |
|--------------|------------------|---------------------|---------------------------|-------------------------|------------------------------------------|
| Individual   | 99               | 600                 | \$975,090                 | \$843,003               | \$132,087                                |
| Large Group  | 441              | 3,120               | \$6,862,650               | \$6,594,692             | \$267,958                                |
| Small Group  | 124              | 813                 | \$1,772,553               | \$1,593,149             | \$179,404                                |
| <b>Total</b> | <b>664</b>       | <b>4,533</b>        | <b>\$9,610,294</b>        | <b>\$9,030,844</b>      | <b>\$579,449</b>                         |

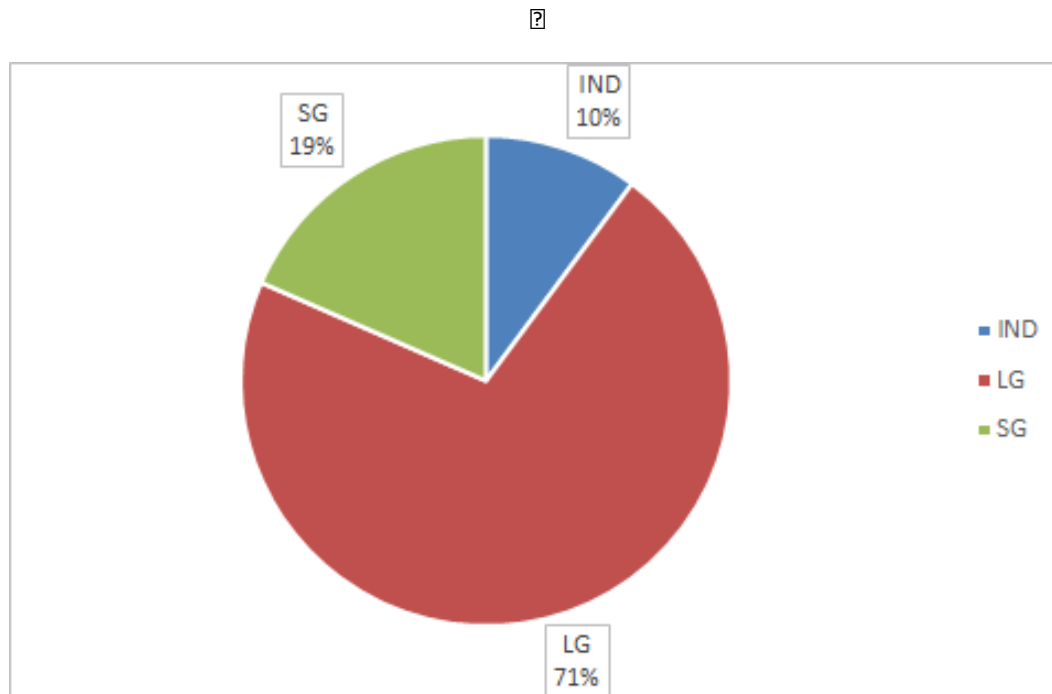
Table 26 includes the average plan costs per enrollee in the commercial market, ranging from **\$14,295 (small group) to \$9,849 (individual)** annually.

*Table 25 Estimated 2024 annual total net costs to the healthcare system, payers and OOP/enrollee*

| Market      | Avg. total paid/claim | Avg. payer paid/claim | Avg. enrollee paid/claim | Avg. total paid/enrollee | Avg. payer paid/enrollee | Avg. enrollee OOP/enrollee |
|-------------|-----------------------|-----------------------|--------------------------|--------------------------|--------------------------|----------------------------|
| Individual  | \$1,625               | \$1,405               | \$220                    | \$9,849                  | \$8,515                  | \$1,334                    |
| Large Group | \$2,200               | \$2,114               | \$86                     | \$15,562                 | \$14,954                 | \$608                      |
| Small Group | \$2,180               | \$1,960               | \$221                    | \$14,295                 | \$12,848                 | \$1,447                    |

<sup>49</sup> Cost information from the data call is the cost of the drug after price concessions.

As shown in Figure 5, the **large group market segment** represented the majority of commercial spending (71.4% of total), followed by individual markets and small group.



*Figure 4 Data call total annual percent spend (payer paid) by market*

## Impact on enrollee access to the drug

*ORS 646A.694(1)(i) and OAR 925-200-0020(1)(i). Data source information provided from carrier data call.*

This section summarizes information reported by carriers regarding plan design features that relate to coverage of Xolair, including prior authorization requirements, step therapy protocols, and formulary placement. The data describes how the drug is positioned within insurance benefit designs and the extent to which utilization management processes were applied during the reporting period.

Based on information reported through the carrier data call, the following plan design features were observed for Xolair. In 2024, approximately **100 percent of reporting plans required prior authorization (PA)** for coverage of the drug, and **no plans required step therapy** before approving its use.

For formulary placement, **4.2 percent of plan types categorized Xolair as a non-preferred drug**, and **all plans covered it**.

Table 26 Plan design analysis from 2024

| Percentage of plans          |        |
|------------------------------|--------|
| Required prior authorization | 100.0% |
| Required step therapy        | 0.0%   |
| On a non-preferred formulary | 4.2%   |
| Not covered                  | 0.0%   |

Note: percentages can equal over 100 percent as some carrier and market combos may have multiple plans that fall under different designs. For example: Carrier A may have three plans in the small group market that require prior authorization but two other plans in the small group market that do not require prior authorization.

## Relative financial impacts to health, medical, or social services costs

*ORS 646A.694(1)(j) and OAR 925-200-0020(1)(j) & (2)(i)(A-B). Limitations in scope and resources available for this statute requirement.*

This section addresses the extent to which the use of Xolair may affect broader health, medical, or social service costs, as compared to alternative treatments or no treatment. At the time of this review, there was no quantifiable data available to PDAB to assess these relative financial impacts in the Oregon population.

The statutory and regulatory criteria calls for consideration of such information to the extent practicable. However, due to limitations in available evidence and reporting, this analysis was not performed. Future reviews may incorporate this data as it becomes available through carrier reporting, manufacturer disclosures, or other sources.

Future reviews may incorporate findings from real-world evidence, health technology assessments, or economic modeling as such data become available.

## Estimated average patient copayment or other cost-sharing

*ORS 646A.694(1)(k) and OAR 925-200-0020(1)(k) & (2)(j)(A-D). Data source information provided from APAC and carrier data call. Data limitations with patient assistance programs*

This section summarizes the average annual enrollee out-of-pocket (OOP) costs for Xolair in Oregon, as reported in 2024 by the Oregon All Payers All Claims (APAC).<sup>50</sup> These costs include

<sup>50</sup> Gross costs from the APAC database are prior to any price concessions such as discounts or coupons. Net cost information from the data call is the cost of the drug after price concessions.

enrollee copayments, coinsurance, and deductible contributions for the drug and are presented by insurance lines of business of Medicare and commercial health care carriers.

Tables 29 and 30 presents the average annual enrollee OOP costs derived from APAC. The APAC data, which includes claims from commercial, and Medicare enrollees, showed average per-enrollee and per-claim and OOP gross costs.

*Table 27 Review drug vs. therapeutic alternatives: Annual out-of-pocket cost per enrollee by line of business (light green table header) and descriptive statistics for total market (dark green table header) <sup>51</sup>*

| Proprietary name | Commercial | Medicare | Medicaid | Mean <sup>52</sup> | Median <sup>53</sup> | IQR     | 75 <sup>th</sup> percentile | 95 <sup>th</sup> percentile |
|------------------|------------|----------|----------|--------------------|----------------------|---------|-----------------------------|-----------------------------|
| <b>Xolair</b>    | \$2,616    | \$1,290  | \$0      | \$2,023            | \$150                | \$2,200 | \$2,200                     | \$12,557                    |
| <b>Cinqair</b>   | \$0        | \$5,314  | \$0      | \$3,189            | \$3,769              | \$5,003 | \$5,003                     | \$6,738                     |
| <b>Dupixent</b>  | \$2,213    | \$1,145  | \$0      | \$1,578            | \$5                  | \$1,447 | \$1,447                     | \$8,118                     |
| <b>Fasenra</b>   | \$1,566    | \$1,754  | \$0      | \$1,386            | \$11                 | \$1,740 | \$1,740                     | \$6,253                     |
| <b>Nucala</b>    | \$1,433    | \$1,656  | \$0      | \$1,215            | \$0                  | \$987   | \$987                       | \$6,824                     |
| <b>Tezspire</b>  | \$1,689    | \$1,281  | \$0      | \$1,137            | \$2                  | \$904   | \$904                       | \$5,809                     |

*Table 28 Review drug vs. therapeutic alternatives: Annual out-of-pocket cost per claim by line of business (light green table header) and descriptive statistics for total market (dark green table header) <sup>54</sup>*

| Proprietary name | Commercial | Medicare | Medicaid | Mean <sup>55</sup> | Median | IQR   | 75 <sup>th</sup> percentile | 95 <sup>th</sup> percentile |
|------------------|------------|----------|----------|--------------------|--------|-------|-----------------------------|-----------------------------|
| <b>Xolair</b>    | \$292      | \$149    | \$0      | \$206              | \$0    | \$91  | \$91                        | \$1,500                     |
| <b>Cinqair</b>   | \$0        | \$531    | \$0      | \$313              | \$0    | \$597 | \$597                       | \$900                       |
| <b>Dupixent</b>  | \$267      | \$194    | \$0      | \$194              | \$0    | \$35  | \$35                        | \$1,149                     |
| <b>Fasenra</b>   | \$330      | \$383    | \$0      | \$248              | \$0    | \$11  | \$11                        | \$1,529                     |
| <b>Nucala</b>    | \$170      | \$231    | \$0      | \$132              | \$0    | \$0   | \$0                         | \$701                       |
| <b>Tezspire</b>  | \$238      | \$185    | \$0      | \$135              | \$0    | \$0   | \$0                         | \$897                       |

<sup>51</sup> Based on 2024 Oregon APAC data across commercial insurers and Medicare. APAC cost information is prior to any price concessions such as discounts or coupons.

<sup>52</sup> Includes summation of copay, coinsurance, and deductible across all from all markets across all claims.

<sup>53</sup> Median represents the middle value of the data set when arranged in ascending order.

<sup>54</sup> Based on 2024 Oregon APAC data across commercial insurers and Medicare. APAC cost information is prior to any price concessions such as discounts or coupons.

<sup>55</sup> Includes summation of copay, coinsurance, and deductible across all from all markets across all claims.

## Clinical information based on manufacturer material

ORS 646A.694(1)(L) and OAR 925-200-0020(1)(L). Information provided from manufacturers and information with sources from contractor(s).

The clinical review section prepared and provided by Myers and Stauffer LC is available at <https://dfr.oregon.gov/pdab/Documents/Xolair-2026-Clinical-Review-Draft.pdf>. The information is preliminary and may be revised, updated, or supplemented before the final report is released.

## Input from specified stakeholders

ORS 646A.694(3) and OAR 925-200-0020(2)(k)(A-D)

### **See Appendix for all stakeholder comment letters.**

Survey-style feedback forms were posted on the PDAB website from April to August 2026 to collect voluntary input about drugs under review from a broad range of stakeholders, including patients, caregivers, and advocacy groups; individuals with scientific or medical training; safety-net providers; pharmaceutical manufacturers; pharmacy benefit managers; and health insurers. This section summarizes the drug-specific input received. Additional general feedback on drug prices and patient experiences is presented in the 2026 community outreach report.

*Note: The information summarized here is based on self-reported survey responses from individuals prescribed certain medications. Participation was voluntary, and responses reflect each individual's personal understanding and interpretation of the questions. As a result, the information may include inconsistencies or inaccuracies related to varying levels of comprehension, recall bias, or misinterpretation of question intent. These limitations should be considered when interpreting the findings.*

### **Patients and caregivers:**

No survey information has been received from patient or caregivers about this drug as of the last update of this document.

### **Individuals with scientific or medical training**

No survey information has been received from individuals with scientific or medial training about this drug as of the last update of this document.

### **Safety net providers**

No survey information has been received from safety net providers about this drug as of the last update of this document.

## Manufacturers

One manufacturer response was received regarding Xolair. The manufacturer reported that Xolair was first approved by the FDA in 2003, remains marketed in Oregon, and was the first anti-immunoglobulin E (IgE) therapy approved for its primary indication. The manufacturer indicated that FDA-approved biosimilar products exist but are not yet marketed and reported that most patent protections expired by 2025. It was also reported that Xolair is approved for non-orphan indications and that its current pricing aligns with its clinical value.

The manufacturer reported providing rebates, discounts, administrative or service fees, and other price concession in the U.S. market while indicating that detailed information regarding recipients of these concessions constitutes confidential business information. It was also reported that the manufacturer offered copay assistance, patient assistance programs, free and replacement drug programs, and support through independent charitable foundations. According to the manufacturer, Xolair is commonly subject to utilization management requirements. Additional comments emphasized that the manufacturer believes Xolair does not present an affordability challenge in Oregon, described approximately \$6.9 million in patient cost-sharing assistance provided to Oregonians in 2024, and noted that additional clinical and value information was submitted separately for the board's review. See Appendix A for additional information from the manufacturer.

## Pharmacy benefit managers

No survey information has been received from PBMs about this drug as of the last update of this document.

## Health insurers

One health plan insurer submitted feedback regarding all drugs being reviewed in 2026. The respondent represented a Medicare Advantage health plan covering more than 500,000 individuals. The health plan reported that the overall impact of each drug on plan spending, rebates, and premium was unknown. The respondent also indicated that patients enrolled in the plan never experience affordability challenges for the drugs under review and that no primary utilization management tools are routinely applied to these medications.

The respondent reported that covered drugs are generally subject to standard copayment cost-sharing and indicated that manufacturer rebates are not applied at the point of sale to reduce patient out-of-pocket costs. When asked which policy approach would most improve prescription drug affordability for patients, the respondent identified manufacturer price reductions. The respondent did not provide additional comments regarding the cost of coverage of the drugs under review.

## Appendix A: Stakeholder feedback

Table 29 Feedback

| Name              | Association to drug under review           | Drug   | Format  | Date      | Exhibit website link                     |
|-------------------|--------------------------------------------|--------|---------|-----------|------------------------------------------|
| Lynda A. Mitchell | Allergy and Asthma Network                 | Xolair | Letters | 8/5/2026  | <a href="#">Click to view the letter</a> |
| Shyam Joshi       | Oregon Health and Science University       | Xolair | Letter  | 8/4/2026  | <a href="#">Click to view the letter</a> |
| Kenneth Mendez    | Asthma and Allergy Foundation of America   | Xolair | Letter  | 8/4/2026  | <a href="#">Click to view the letter</a> |
| Jennifer Morgan   | Registered nurse, Baker Allergy and Asthma | Xolair | Letter  | 8/4/2026  | <a href="#">Click to view the letter</a> |
| Evan Hamilton     | Student                                    | Xolair | Letter  | 8/3/2026  | <a href="#">Click to view the letter</a> |
| Jessica Hamilton  | Patient                                    | Xolair | Letter  | 8/3/2026  | <a href="#">Click to view the letter</a> |
| Tyron Tracy       | Portland Allergy and Asthma                | Xolair | Letter  | 7/31/2026 | <a href="#">Click to view the letter</a> |
| Susan Powell      | Patient                                    | Xolair | Letter  | 7/28/2026 | <a href="#">Click to view the letter</a> |
| Dr. Adam Williams | Summit Health                              | Xolair | Letter  | 7/2/2026  | <a href="#">Click to view the letter</a> |
| Mary Wachter, RN  | Genentech Inc                              | Xolair | Letter  | 5/6/2026  | <a href="#">Click to view the letter</a> |
| Mary Wachter, RN  | Genentech Inc                              | Xolair | Letter  | 3/13/2026 | <a href="#">Click to view the letter</a> |
| Mary Wachter, RN  | Genentech Inc                              | Xolair | Letter  | 2/9/2026  | <a href="#">Click to view the letter</a> |