FEBRUARY 2023

ESTIMATES OF U.S. BRAND DRUG COMMERCIAL NET PRICES

ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED ON FEDERAL SUPPLY SCHEDULE (FSS) PRICING



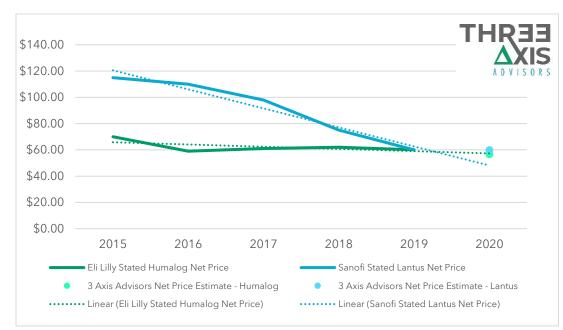
INFO@3AXISADVISORS.COM

Executive Summary

Many standard benefit designs for prescription drugs, including Medicare, require patient costsharing in order for members to obtain medications. The cost sharing arrangements often require that for the most expensive therapies – typically recognized as brand and/or specialty medications – the patient must pay a percentage of the manufacturer-set list price for the therapy. However, it is well recognized that manufacturer list prices do not reflect the drug's net cost when rebates and other price concessions the manufacturer offers are considered. As a result, patients pay a higher share of net drug spending in the aggregate for highly rebated drugs, potentially reducing the value of their insurance.

As a result of the growing disconnect between prescription drug list prices and net prices, individual estimates of net drug spending would be extremely beneficial in helping evaluate and contextualize U.S. drug prices. 3 Axis Advisors, LLC, undertook a study of the United States Department of Veterans Affairs (VA) drug pricing in an attempt to evaluate the potential accuracy of using VA pricing to estimate net commercial drug costs in the most favorable of circumstances. Many federal agencies are uniquely positioned to access brand medications at net prices available to the "most favored" commercial payers through the use of the Federal Supply Schedule (FSS). The FSS price that the VA negotiates is available in the public domain, enabling potential assessment of its use as a net price estimate.

In this study, we used the publicly available FSS pricing data to develop a net drug price estimate for brand pharmaceuticals in the U.S. We then analyzed our estimate to known net drug prices and found that our estimate produced similar results to the stated net price by the manufacturer. More specifically, in their 2020 investigation of the prices of Lantus insulin, Senators Chuck Grassley and Ron Wyden found a net price aligned to our FSS-based estimate (see **Figure 1** below):







ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

Further, we compared our estimate to Medicare Part D pricing data in a manner similar to prior work by the Congressional Budget Office (CBO). Our estimates find that the gap between FSS prices and net Part D prices is smaller than 7% as estimated by CBO for 2017. As a result, we find that FSS prices may be useful in predicting the average rebates paid by manufacturers of brand-name drugs to Part D plans.

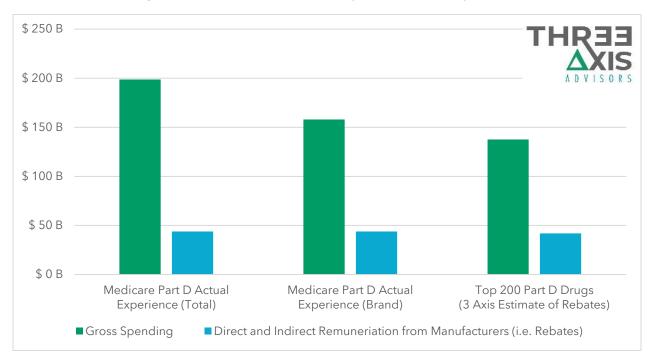


Figure 2: Gross and Net Medicare Part D Expenditures, Various Experiences



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES Alternatives to existing net price estimates based upon federal supply schedule (FSS) pricing

Contents

3/

Executive Summary
Table of Figures
Table of Tables5
Overview of U.S. Drug Supply Chain and U.S. Drug Prices
Overview of Drug Pricing Variability9
An Overview of Department of Veterans Affairs Pricing11
Scope of Work13
Methodology
Results15
Discussion
Detailed Methodology23
Data Sources23
CMS Medicare Part D database23
Department of Veterans Affairs Federal Supply Schedule (FSS) Pricing
Medi-Span PriceRx23
Data Transformations24
CMS Medicare Part D database24
VA FSS Pricing and Medi-Span WAC Analysis to Generate Net Pricing Estimates24
Data Validations27
Limitations
About 3 Axis Advisors LLC
Acknowledgements
Appendix A – Medicare Part D Database NDC Match List
Disclaimers
References

ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

Table of Figures

Figure 1: Comparison of Net Lantus Price, U.S. Senate Investigation vs. FSS-net price estimate	. 2
Figure 2: Gross and Net Medicare Part D Expenditures, Various Experiences	. 3
Figure 3: A Streamlined Overview of the Retail U.S. Prescription Drug Supply Chain	.6
Figure 4: Source of Prescription Drug Insurance, 2021	.7
Figure 5: Medicare Gross Spending Trends, 2015 to 2020	.7
Figure 6: Medicare Utilization Trends, 2015 to 2020	.8
Figure 7: Medicare Part D Net Price Growth, 2010 to 2020	10
Figure 8: Average Price of Top-Selling Brand-Name Drugs as a Percentage of Their Average Net	
Price in Medicare Part D, CBO (2017)	12
Figure 9: Humalog Identified List and Net Price, 2015 to 2020	16
Figure 10: Lantus Identified List and Net Price, 2015 to 2020	17
Figure 11: Medicare Part D Gross and Net Expenditures, 2020 (Actual Experience vs. Model)	19

Table of Tables

Table 1: Observed WAC Discounts for Estimated Net Price by Therapeutic Class	15
Table 2: Evaluation of Net Price to WAC, Manufacturer Stated vs. 3 Axis Advisors Observation of	FSS
	16
Table 3: Comparison of U.S. House Investigation Reported Net Price and FSS Net Price Estimate.	17
Table 4: Analysis of NDCs per Contract in VA FSS Pricing	27
Table 5: FSS Pricing Predating Contract Analysis	27
Table 6: ContractID Variability Across NDC	28



Overview of U.S. Drug Supply Chain and U.S. Drug Prices

Within the United States, understanding the price of a prescription drug is surprisingly complex. The rationale for the complexity can be attributed to, but not fully explained by, the variety of drug pricing benchmarks available and the variety of ways which people obtain access to medications (**Figure 3**).

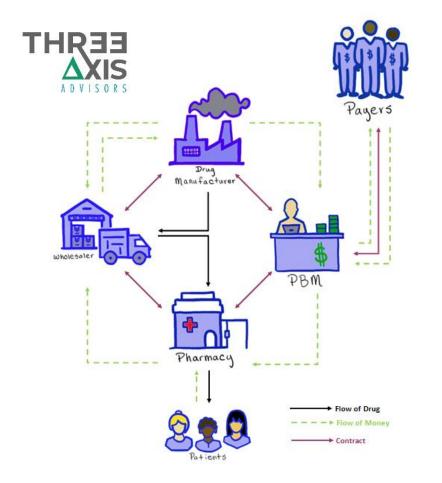
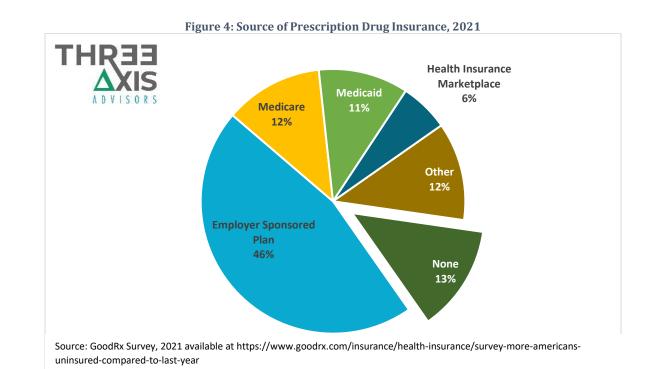


Figure 3: A Streamlined Overview of the Retail U.S. Prescription Drug Supply Chain

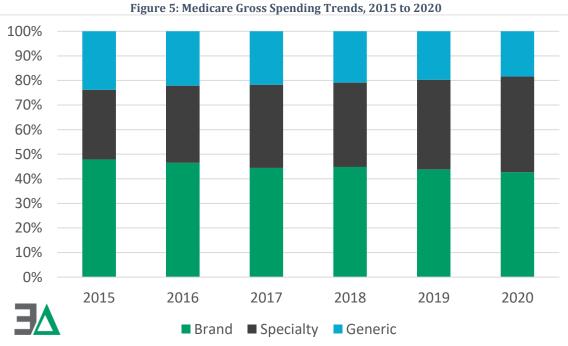
While **Figure 3** may suggest a relatively straightforward drug supply chain, the U.S. healthcare system is segmented with a variety of potential payers for prescription medications. In general, a patient acquires a prescription medication by paying for all or some portion of the medication cost themselvesⁱ, with any remaining costs being covered by some form of health insurance. There are various forms of prescription drug insurance in the U.S., which further segments the market. Government programs like Medicare and Medicaid represent a significant form of prescription drug insurance, but the majority of people use commercial insurance plans, generally acquired through their employer, to help pay for drugs (**Figure 4** on the next page).

ⁱ Patient pay amounts are often referred to as copayments or coinsurance amounts.



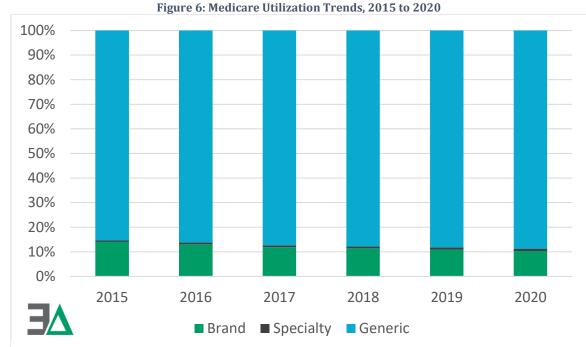


Further segmenting the price of prescription drugs in the U.S. are the various types or categories of medications available. Branded and specialty medications are the costliest but least utilized medications, while generic medications are the least expensive but most utilized.¹ Based on 2020 Medicare data, brand and specialty medications represent more than 75% of gross drug costs while accounting for less than 15% of utilization in 2020 (**Figures 5 & 6**, continued on next page).



Source: 46brooklyn Part D Drug Pricing Dashboard available at https://www.46brooklyn.com/part-d-drug-pricing-dashboard

ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES



Source: 46brooklyn Part D Drug Pricing Dashboard available at https://www.46brooklyn.com/part-d-drug-pricing-dashboard

Branded and specialty medications are made by drug companies that have patents and market exclusivity periods that protect their product from competition from other manufacturers.² During this protected period, pharmaceutical companies set higher prices for their medications, which they use to recoup development costs, market their new therapy, generate profits, and support the development of the next therapeutic advancement.³

Because of the expense related to brand and specialty medications, it is not uncommon for insured patients to pay a percentage of the drug manufacturer's set list price in order to obtain the medication.⁴ This may create some pressure on manufacturers to lower the price in order to secure more customers who can purchase their products. In addition to patient affordability pressures, pharmacy benefit managers (PBMs) negotiate with drug manufacturers for price concessions for their products on behalf of the patient's insurance. These price concessions are predicated on the use of restricted formulary or utilization controls by the PBM, which potentially limit sales of the drug manufacturer's medication.⁵ In competitive classes, competition amongst drug manufacturers takes the form of retrospective rebates and fees paid to the PBM by the manufacturer - generally based on a drug's manufacturer-set price and volume – to obtain favorable formulary placement and/or less utilization control. The reduction, or easing, of these controls by the PBM results in more sales of the drug manufacturer's product. However, it is unknown what portions of rebates and fees are passed on by PBMs to patients and plan sponsors and how much is retained for themselves as profits.⁶ The ability to retain some drug manufacturer remuneration creates a strong incentive for PBMs to prefer high-list-price drugs with large rebates, which leads to the placement of some branded drugs on a better formulary tier than alternatives, which may have a much cheaper list price.⁷ The secretive nature of the retrospective price concessions between manufacturers and PBMs complicates studies of drug pricing within the U.S. and can create significant inequity among drug purchasers as net costs vary from consumer to consumer.



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

Overview of Drug Pricing Variability

There is no central authority regulating the prices of prescription drugs in the U.S. Rather, the U.S. relies primarily on market forces, briefly described in the prior section, to control drug prices.⁸ In general, prescription drugs in the U.S. have high list prices set by manufacturers, which are reduced by negotiated retrospective price concessions (i.e., rebates). The secretive and confidential nature of retrospective remuneration from drug manufacturer to PBM or government program creates a gap when assessing actual net prescription drug prices. High prescription drug prices are routinely cited as a principal healthcare concern by U.S. voters, but the concerns are generally not related to the net price of the medication (recall that patients typically incur a cost as a percentage of list – not net – price).⁹

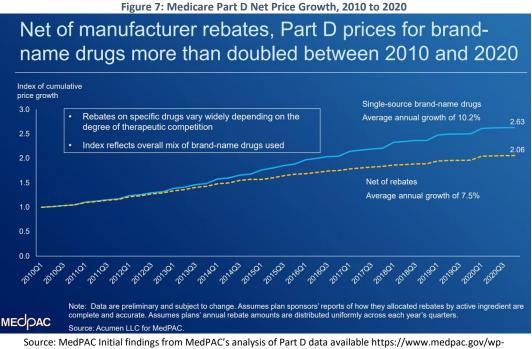
Various federal regulations set standards for specific drug pricing benchmarks (sometimes referred to as reference prices). What most patients pay for prescription drugs frequently reflects a portion of a drug's list price, often referred to as wholesale acquisition cost (WAC) or average wholesale price (AWP).¹⁰ These list prices have routinely increased 5% to 10% year-over-year for branded drugs over the last decade.¹¹ However, the "net" drug prices – that is the price after accounting for drug manufacturer price concessions to drug supply chain participants such as PBMs – have risen by 0 to 3% annually.¹²

However, we often do not have accurate ways to distinguish between the overall discount of drug manufacturer price concessions and specific payer types. The U.S. drug purchasing paradigm is segmented, and that segmentation results in differences in net price experience. The "best" rebates, in terms of aggregate price concessions, are experienced by 340B providers and state Medicaid programs. This is because statutorily they receive the best price.¹³ However, part of the goal of this paper is to investigate potentially more viable ways to estimate net prices in Medicare and within commercial payers through removing the influence of these "best prices" from the estimate of net prices. Medicare Payment Advisory Commission (MedPAC), a nonpartisan independent legislative branch agency that provides the U.S. Congress with analysis and policy advice on the Medicare program, has demonstrated that Medicare is facing net price increases year-over-year (despite net prices in the aggregate, from a drug manufacturer's perspective, potentially going down). MedPAC identified that Part D prices net of manufacturer rebates for brand name drugs has more than doubled between 2010 and 2020 (**Figure 7** on the next page).



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES Alternatives to existing net price estimates based upon federal supply schedule (FSS) pricing





content/uploads/2021/10/MedPAC-DIR-data-slides-April-2022.pdf

The disconnect between list price and net price growth for the most expensive therapies reflects the rapid growth in manufacturer price concessions, which only lower net prices. The disconnect plays out in such a way that many prescription drug insurance plans base their costs, and therefore their premiums, on the net price of medications while keeping patient cost share amounts tied to the list prices. Ultimately, the result is often health plans saving money (relative to those inflated list prices) and potentially gaining more customers through more attractive premium costs, but a devaluation of the patient's insurance through higher proportional drug costs.¹⁴ Applying the value of retrospective manufacturer price concessions to reducing premiums for insurance can potentially save an equal amount of money for all enrollees, making healthcare plans appear more attractive based upon their upfront cost. But basing cost sharing on the list price of drugs (as is done in Medicare Part D¹⁵ and many other plans) increases out-of-pocket costs for those using drugs with rebates, especially for those patients taking drugs with higher disconnects between the gross and net prices. This raises costs for this subset of beneficiaries that are tasked with overpaying for their medications in order for rebates to be generated in the first place in a phenomenon sometimes referred to as "money from sick people".¹⁶ In addition to raising costs for this subset of beneficiaries, the trend of increasing both list prices and rebates risks the dilution of value of prescription drug insurance such that it provides less financial protection. Because many standard benefit designs for prescription drugs, including Medicare, require patient cost-sharing parameters that generally reflect pre-rebate drug prices, patients pay a higher share of net drug spending in the aggregate for highly rebated drugs, distorting and reducing the value of their insurance.¹⁷ The ultimate effects of these trends can result in poorer healthcare outcomes for patients as they may struggle to afford and thus stay adherent to their medications.18

As a result of these complicating factors, individual estimates of net drug spending would be extremely beneficial in helping in the evaluation of the true nature of U.S. drug prices. Today, many have already endeavored to approximate net price realities through a variety of means, underscoring



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

the significant public interest in where the dollars are flowing underneath those rising list prices.¹⁹ ²⁰ Knowledge of individual drug net prices can help inform data analysis and financial modeling on current and future policy proposals aimed at drug pricing reform, contracting strategies for plan sponsors seeking to reduce unnecessary drug spending, and broader drug pricing research endeavors. To that end, with the support of Arnold Ventures, we at 3 Axis Advisors undertook a detailed study of the U.S. Federal Supply Schedule pricing (FSS pricing) in an attempt to evaluate the potential accuracy of using FSS pricing to estimate net commercial drug costs.

An Overview of Department of Veterans Affairs Pricing

The United States Department of Veterans Affairs (VA) provides prescription drugs for approximately 9 million veterans, with prescription drug spending exceeding billions of dollars annually for outpatient care.²¹ The VA is a federal program that is a direct purchaser of drugs, which grants it access to pricing under the FSS. The FSS is intended to allow direct federal purchasers to buy branded drugs, including specialty medications, at prices equal to or below the lowest prices negotiated between manufacturers and their "most favored" commercial customers. The "most favored" clause is defined as commercial customers that receive the best discount or price agreement.²² However, actual prices within the VA are not always equal to the FSS price for a product, as regulations recognize that the government may not always agree to the commercial terms necessary to secure the best price.

Further reducing net drug costs in the VA, the department belongs to a collective of the four largest direct federal purchasers – namely the VA, the Department of Defense (DoD), the Public Health Service, and the Coast Guard – known as the "Big Four" agencies. Statutorily, the Big 4 drug purchases have a price cap, known as the federal ceiling price (FCP). The FCP is equal to 76 percent of a drug's nonfederal average manufacturer price (non-FAMP) in the previous year, minus an additional amount if the non-FAMP grew more quickly than the consumer price index (CPI-U) during the previous one-year period. The maximum price a drug manufacturer is allowed to charge the Big 4 agencies is the lower of the FSS price or the FCP.²³

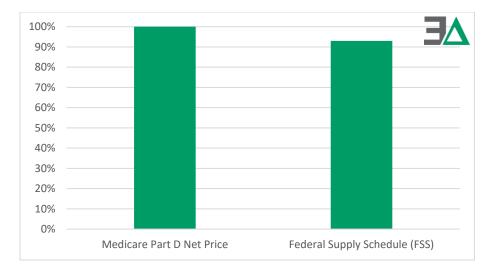
While these prices represent a starting point for drug pricing within the VA, the VA may obtain further price concessions. The VA uses a national formulary, implemented in 1997.²⁴ Similar to PBM functions, the VA formulary enables the VA to prefer or exclude certain drugs from use within the system on the basis of safety, efficacy, and cost.²⁵ The VA has direct administrative influence over health care providers in its integrated system, so in many cases, it is well positioned to strongly encourage the use of preferred drugs, potentially increasing its ability to secure greater manufacturer price concessions, thus lowering the net cost to the department.

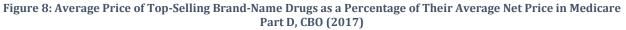
Because of the VA's status as a federal purchaser of drugs, and the public availability of the FSS and Big 4 prices, the VA provides some of the most transparent data into net drug prices in the U.S. based primarily upon the FSS statutory language. Several historical state initiatives, such as California's Proposition 61 in 2016 and Ohio Issue 2 in 2017,²⁶ have sought to mandate that those respective states pay no more than VA prices for medications. While these initiatives recognized *the potential* for savings with a VA pricing ceiling, neither had detailed fiscal savings associated with their proposals, and due to a number of complicating factors with the mechanics of the proposals, those initiatives were rejected by voters.^{27 28} However, the U.S. government has conducted several drug pricing research studies between the various federal programs that purchase prescription drugs. A Government Accountability Office (GAO) conducted a study comparing federal drug pricing



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

approaches between Medicare prices net of direct and indirect remuneration (DIR) and the VA prices.²⁹ Their study found that for the sample of 399 brand-name and generic prescriptions in 2017, the VA prices were on average 54% less per unit than Medicare Part D, even after accounting for manufacturer and pharmacy price concessions. Another government report by the Congressional Budget Office (CBO) compared the average net price of top-selling brand medications between Medicare, FSS, Big 4, VA, DoD TRICARE, and Medicaid.³⁰ The study demonstrated that FSS pricing was within 7% of the net Medicare price in the aggregate (**Figure 8**).





Ultimately, it is well established that the VA has access to specialized pricing schemes via statute and its negotiation capabilities. Unlike other health plans or pharmacy providers, the VA does not have an obvious interest in retrospective rebates, as profitability of their program is not a principal concern. Rather, the VA appears interested in securing low-cost products up front to manage budgets and cash flow. To this end, it appears an excellent source of study in our ongoing efforts to better understand and contextualize drug prices.



Scope of Work

Given the interest of net drug prices for brand name medications, we gathered public FSS pricing data to develop an estimate of net commercial drug prices. We began by limiting the FSS data to products (identified by their national drug code [NDC]) that appeared to be brand name and/or specialty products. We did this by limiting the NDCs to products that were approved under a New Drug Application (NDA) or Biologic License Application (BLA) and whose products are marketed under a trade name.ⁱⁱ Our initial estimate of net price is based directly upon the FSS value, given that the definition of FSS prices as being "the prices that manufacturers charge their most-favored commercial customers under comparable terms and conditions"³¹ as well as the prior work of government reports demonstrating the comparative pricing similarities (see **Figure 5** previously).³² Recognizing that not all branded medications have a FSS price, we developed a process to estimate a net price for branded products without an FSS price (see **Methodology** section).

To test the validity of our net price estimates, we identified some of the characteristics of our net price estimates (such as average, median, minimum, and maximum discounts associated with our estimates), conducted a comparison of net prices to known net prices in the public domain, and performed a comparison of our net price estimate to the net price of brand products in Medicare Part D. While other researchers and organizations have developed estimates of net prices based on a "top-down" approach by exploring drug manufacturer financial statements and sales data, our methods may be best described as "bottom-up," as they are developed for individual products based upon the public FSS data.³³

Methodology

To generate an estimate of best commercial net U.S. drug prices, we gathered all FSS prices publicly available on the VA's website.³⁴ We assumed that the FSS price was equal to the net drug price available to the "most favored" commercial payer based upon the General Services Acquisition (GSA) Manual.³⁵ ⁱⁱⁱ The VA has delegated authority under the GSA to manage pricing for Federal customers of commercial prescription drug products.³⁶ For products without an FSS price, we developed an estimate of their net price under the assumption that products within a therapeutic class would carry similar net prices. Prior work has demonstrated that within-class changes for brand-name medications often seem to move in a general equivalent fashion.³⁷ Although this prior work has focused on the list price of manufacturer products, drug manufacturers have themselves suggested that list price increases are off-set to commercial payers through PBMs via increased retrospective price concessions (i.e., rebates).³⁸ ³⁹ ⁴⁰ Taken together, the available data is suggestive, though not conclusive, that the degree to which list price behaviors are correlated within therapeutic classes, then net prices would likely follow a similar relationship (if list price increases are principally taken to provide rebates).

ⁱⁱⁱ It is important to note that the U.S. government recognizes that the terms and conditions of commercial sales vary, and there may be legitimate reasons why the best price is not achieved (including the possibility of outperforming the lowest price in the private sector).



ⁱⁱ As its name implies, a NDA is an application to permit the sale and marketing of a new drug into the U.S. market. NDAs generally address small molecule products. A BLA is a similar application to a NDA except that it is a request to introduce a biologic product, a specific type of molecule regulated by the Public Health Service Act.

To generate estimated net prices for non-FSS-priced drugs, we compared the existing FSS price to the concurrent WAC price to develop a FSS to WAC ratio. We then applied the FSS to WAC ratio to therapies within the same therapeutic classification that did not have an existing FSS price to generate a net price estimate for those products. (See **Detailed Methodology** section for the complete methods).

In an effort to confirm the accuracy of our estimates, we compared our generated net prices to the top 200 brand and specialty medication costs in Medicare alongside the retrospective price concessions (which in Medicare are referred to as direct and indirect remuneration [DIR]). The degree to which our estimates produce equivalent discounts to known manufacturer price concessions in Medicare is suggestive of an accurate estimate of net price for the medication.



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

Results

Our best commercial net pricing estimate produces an average discount to brand medications of 23% to the WAC price. The median discount is a 20% discount to the WAC price. The range of discounts is from 0 to 97% of WAC for brand-name products (Note that products associated with the maximum WAC discount can be brands with generic alternatives and the brand discounts appear to approach the generic price). The average discount based upon therapeutic class is detailed in **Table 1** below.

Therapeutic Class	Average WAC Discount	Median WAC Discount	Minimum WAC Discount	Maximum WAC Discount
Analgesics	20%	28%	0%	63%
Anti-Infective Agents	22%	16%	0%	93%
Blood Formation Agents	17%	11%	0%	62%
Cancer and Adjunctive Agents	20%	17%	0%	70%
Cardiovascular Agents	23%	18%	1%	79%
Central Nervous System Agents	14%	10%	0%	62%
Dermatological Agents (including eye, ear, and skin treatments)	22%	20%	0%	86%
Endocrine and Metabolic Agents	30%	28%	0%	72%
Gastrointestinal Agents	27%	30%	0%	97%
Genitourinary Agents	22%	18%	2%	41%
Neuromuscular Agents	21%	19%	0%	92%
Nose & Respiratory Agents	24%	20%	0%	74%
Nutritional Agents	10%	0%	0%	61%
Psychotherapeutic and Neurological Agents	16%	16%	0%	53%
Stimulant Agents	25%	17%	5%	46%
Vaccines and Other Passive Immunizing Agents	36%	31%	0%	51%
Agents Not Elsewhere Classified	11%	27%	0%	85%
Overall	23%	20%	0%	97%

Table 1: Observed WAC Discounts for Estimated Net Price by Therapeutic Class

In evaluating these net price estimates, individual products were selected for further evaluation based on their prior study in the public domain regarding their average net price. This includes manufacturers who have stated what the average discount associated with their medications are.⁴¹ Nevertheless, we compared the estimated net price for labelers with information in the public domain to their products within our developed net pricing file. Comparisons were weighted on a NDC-basis, and not to utilization of those NDCs. This does appear to differ from the methods used by the manufacturer in developing their net price estimates, as they appear to be weighted based upon sales of their individual products (i.e., NDCs). In addition, manufacturer net price estimates in these



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

cases appear focused on the aggregate net price, which would include rebates and price concessions given to non-commercial payers (i.e., Medicaid and 340B providers). In evaluating the net prices for these manufacturers based upon our estimates, we get the following comparisons (**Table 2**):

Drug Manufacturer	Mfr Stated Average Reduction From List Price	Observed Average Reduction From List Price
Eli Lilly & Company	-57%	-21%
Janssen Pharmaceuticals	-51%	-20%
Merck & Company	-44%	-21%
Novartis	-48%	-17%
Sanofi-Aventis U.S.	-55%	-44%

Table 2: Evaluation of Net Price to WAC, Manufacturer Stated vs. 3 Axis Advisors Observation of FSS

While **Table 2** does not provide a great deal of confidence in regard to the accuracy of our commercial net price estimate, we are nonetheless encouraged by specific product examples that appear to support our commercial net cost estimate. In Eli Lilly's report, they identify that Humalog (insulin lispro) has a net price of approximately \$60 per vial in 2019.⁴² This is in line with our estimated net price in 2020 for the same product (**Figure 9**):



Figure 9: Humalog Identified List and Net Price, 2015 to 2020

Sanofi provided a similar chart for their Lantus product. Again, the degree to which our estimated net price confirms on a per-drug basis to the experience Sanofi self-identified is, in our view, highly suggestive of the accuracy of our net price estimate (**Figure 10** on the next page).





Figure 10: Lantus Identified List and Net Price, 2015 to 2020



Outside of the insulin examples, from 2020 to 2021, the U.S. House of Representatives Committee on Oversight and Reform published nine reports investigating drug prices. The reports covered the products of H.P Acthar Gel, Gleevec, Enbrel, Sensipar, Revlimid, Copaxone, Humira and Imbruvica. All reports detailed, to varying degrees, the net price behavior of these products over time based on manufacturer reports. These reports represent some of the best information regarding net price behavior in the public domain. We compiled the net price information for these drugs in **Table 3** (generating their discount as a percentage of highest WAC price published in the reference year). We then compare the list to net price discount in these reports to the values our FSS pricing estimate produces (**Table 3**).

Drug	Year	US House Committee on Oversight and Reform Net Price	Equivalent WAC Discount	FSS Estimated WAC Discount
H.P Acthar Gel ^{iv}	2018	\$33,725 (per vial)	86% of WAC (14% rebate)	75% of WAC (25% rebate)
Gleevec ^v	2018	\$6,690.70 (per unit)	59.2% of WAC (40.8% rebate)	98% of WAC (2% rebate)

Table 3: Comparison of U.S. House Investigation Reported Net Price and FSS Net Price Estimate

^v Staff Report - Committee on Oversight and Reform U.S. House of Representatives, October 2020; Available at: https://oversightdemocrats.oversight.house.gov/files/Novartis%20Staff%20Report%2010-1-2020.pdf#page=40; WAC estimate derived by 3 Axis Advisors, LLC



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

^{iv} Staff Report - Committee on Oversight and Reform U.S. House of Representatives, October 2020; Available at: <u>https://oversightdemocrats.house.gov/sites/democrats.oversight.house.gov/files/Mallinckrodt%20Staff%20Report%2010-01-20%20PDF.pdf#page=48</u>; WAC estimate derived by 3 Axis Advisors, LLC

Drug	Year	US House Committee on Oversight and Reform Net Price	Equivalent WAC Discount	FSS Estimated WAC Discount
Revlimid ^{vi}	2018	\$598.21 (per unit)	86% of WAC (14% rebate)	86% of WAC (14% rebate)
Copaxonevii	2019	\$2,297 (monthly)	39% of WAC (61% rebate)	95% of WAC (5% rebate)
Humiraviii	2020	\$1,996 (not explicitly stated)	55% of WAC (45% rebate)	55% to 80% of WAC (20% to 45% rebate)
Imbruvica ^{ix}	2017	\$115,533 (420 mg per day dosing, annually)	56% to 87% of WAC (13% to 34% rebate)	78% of WAC (22% rebate)

In **Table 3**, we see variability in our estimate to track known net prices from these Congressional Committee investigations. Part of these variabilities could be attributed to temporal differences between the known net price behavior and current pricing (many of the U.S. Committee investigations showed increasing net prices over time) and/or the current availability of alternatives to some of the products (net pricing behavior changes with the introduction of a direct competitor to a previously exclusive product, as detailed in several of the U.S. House reports).

Unfortunately, there were limited additional examples of specific products that had publicly stated net commercial prices. Given the accuracy of the net price for the individual products we did find, we believe that the differences in **Table 2** can largely be attributed to:

(1) temporal differences between the manufacturer estimates and our own (2019 versus 2020), resulting in different drug mixes through new product launches and/or products losing exclusivity;

(2) the differences in approach to reporting an average price reduction (manufacturers appear to be reporting a weighted average by sales compared to our average based upon NDC);

(3) differences in drug manufacturer product attribution (the use of labeler codes may not accurately capture all products under a manufacturer); and

(4) our focus on identifying net prices for Medicare and Commercial payers, and not the net price to the manufacturer.

^{vii} Staff Report - Committee on Oversight and Reform U.S. House of Representatives, September 2020; Available at: <u>https://oversightdemocrats.house.gov/sites/democrats.oversight.house.gov/files/Teva%20Staff%20Report%2009-30-2020.pdf</u>; WAC estimate derived by 3 Axis Advisors, LLC

^{ix} Staff Report - Committee on Oversight and Reform U.S. House of Representatives, May 2021; Available at: <u>https://oversightdemocrats.house.gov/sites/democrats.oversight.house.gov/files/Committee%20on%20Oversight%20and%20Reform%20-</u> <u>%20AbbVie%20Staff%20Report.pdf#page=56</u>; WAC estimate derived by 3 Axis Advisors, LLC



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

^{vi} Staff Report - Committee on Oversight and Reform U.S. House of Representatives, September 2020; Available at: <u>https://oversightdemocrats.house.gov/sites/democrats.oversight.house.gov/files/Celgene%20BMS%20Staff%20Report%2009-30-2020.pdf#page=41</u>; WAC estimate derived by 3 Axis Advisors, LLC

^{viii} Staff Report - Committee on Oversight and Reform U.S. House of Representatives, May 2021; Available at: <u>https://oversightdemocrats.house.gov/sites/democrats.oversight.house.gov/files/COR-AbbVie-Selected-Investigation-Documents.pdf#page=133</u>; WAC estimate derived by 3 Axis Advisors, LLC

Nonetheless, it is important to acknowledge the potential limitation of our estimate based upon the aggregate manufacturer results.

In order to make a comparison between our estimates of drug net prices and prior research, we conducted an analysis to compare the top 200 brand-name medications in Medicare by overall gross expenditures to the known overall experience in Medicare from a gross and net cost perspective. Medicare uses a process called direct and indirect remuneration (DIR) to "true-up" Medicare's prospective payments for prescription medications to Medicare Part D plan sponsors' final cost. DIR amounts are post-sale price concessions to Medicare Part D plan sponsors which are segmented into categories. The largest DIR category is manufacturer rebates, which totaled \$43.9 billion in 2020. Part D plan sponsors also collected \$9.5 billion in pharmacy provider DIR.⁴³ Manufacturer rebates are associated with the sale of brand pharmaceuticals. As a result, we should contextualize the \$43.9 billion dollars in Medicare Part D in 2020 in terms of brand expenditures (as the brand manufacturers are the ones producing the retrospective rebates). As can be seen in **Figure 11**, our net price estimate produces similar results to Medicare's DIR experience in 2020.

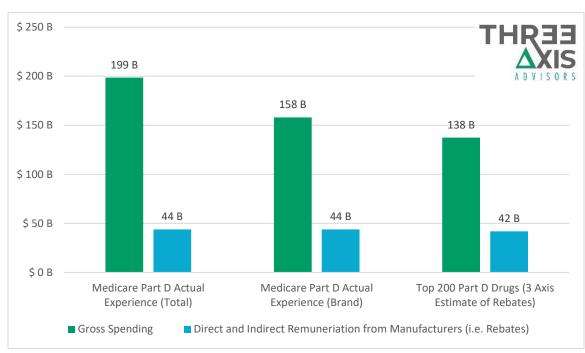


Figure 11: Medicare Part D Gross and Net Expenditures, 2020 (Actual Experience vs. Model)

According to the 2022 Medicare Trustees report, DIR from all sources was equivalent to 27% of total drug spending in 2020. As drug expenditures were approximately \$198 billion in 2020, total DIR in Medicare can be estimated to be \$53.5 billion. However, Medicare DIR includes sources beyond the drug manufacturer (i.e., rebates), such as pharmacy network price concessions. Other sources of DIR were reported to be \$9.5 billion in 2020. Taken together, we identify that drug manufacturer rebates in 2020 for Medicare Part D were \$44 billion (\$53.5 billion - \$9.5 billion).⁴⁴ Consequently, across all brands, manufacturer DIR averaged 27.8% of gross brand spending in 2020 (\$44 billion divided by \$158 billion). Utilizing FSS prices, we estimated that rebates averaged 30% of gross brand drug spending on the top 200 brand-name drugs in 2020 (\$42 billion divided by \$138 billion). Our estimated net price is within 3% of the Medicare experience, without accounting for the fact that the

ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES



top 200 brand pharmaceuticals in Part D likely produce proportionally more of the total rebates than the other remaining products.



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES Alternatives to existing net price estimates based upon federal supply schedule (FSS) pricing

Discussion

Prior legislative efforts targeting drug prices, as well as the ballot proposals in California in 2016 and Ohio in 2017, suggest an ongoing interest in reducing the costs of prescription drugs. In addition, a 2022 Gallup poll found that an overwhelming majority of Americans (86%) report that a candidate's plan to reduce the cost of prescription drugs is very or somewhat important in determining their vote.⁴⁵ Brand medications represent the costliest therapies within the U.S. drug market today. However, brand drug prices can be difficult to contextualize given the disconnect between the manufacturer-set list price and the net price after rebates and other retrospective price concessions. While list price information can generally be accessed through purchasing drug reference files, granular net price estimates are more challenging to access. Our estimate of brand net prices in this study is based upon FSS pricing being equivalent to the "most favored" price available in the commercial market. Our estimate appears reasonably accurate in a broad sense, as it conforms with prior government-derived estimates in the aggregate.⁴⁶

However, it is important to recognize that the "most favored" price is not available to all commercial payers in all situations. This can happen as a result of differences in formulary placement and utilization controls by commercial market participants that do not conform with the "most favored" contract (a challenge the FSS pricing structure itself acknowledges). Furthermore, select commercial participants may not be able to secure as large of price concessions as others based on the market size or sophistication of the entity obtaining rebates. Many U.S. drug price concessions are predicated on market share; so smaller groups may not be able to secure the best price given their relative market share. This may explain some of the consolidation regarding rebate negotiations observed within the U.S. market over the last five years.⁴⁷ The growth of rebate aggregators or group purchasing organizations, and the joining of market competitors into the same pool to secure rebates via these rebate aggregators may be related to the market size differences of these groups.⁴⁸ Furthermore, the presence of these pools, and the creation of additional intermediaries, may present opportunities for the supply chain to arbitrage aspects of manufacturer price concessions to avoid fully passing through what otherwise may have been rebate dollars owed to plan sponsors and/or beneficiaries.

As previously stated, the VA acknowledges that FSS prices may not always equal the "most favored" commercial price, given differences in contractual requirements between the "most favored" commercial contract and the terms the VA is willing to agree to as part of their FSS price determination.⁴⁹ Our estimates of net price appear reasonably aligned, given the stated net prices of products of select manufacturers. We hope that providing a transparent file of these net prices will enable other researchers to refine the estimate, as well as support future research into drug prices by providing a manner to potentially contextualize net prices alongside list prices.

It is important to acknowledge that the methods used to determine prescription drug prices in federal programs can have knock-on effects on drug manufacturers' decisions regarding their list prices and rebates offered in the private sector. Changes in drug pricing policies within any segment of the U.S. market can affect net prices paid in other segments. As an example, the best-price component of the Medicaid Drug Rebate Program (MDRP) makes it more costly for drug manufacturers to offer large discounts to private payers, because the manufacturers would have to offer the same discounts to Medicaid, and by extension 340B providers, if those discounts exceeded 23.1 percent of the AMP (plus the CPI-penalty).⁵⁰ An admittedly dated analysis by CBO found that the introduction of the MDRP increased the net prices paid by some private payers by as much as 17%



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

from 1991 to 1994.⁵¹ Another analysis found that the MDRP raises private payers' prices for drugs when sales through Medicaid are a large share of the drugs' total sales (i.e., private payers are less represented in the drug's sales relative to Medicaid).⁵² However, others have questioned the validity of these findings.⁵³ Regardless, it is clear that without more accurate and transparent information regarding net prices, research and analysis into the issue will continue to be limited.

Most existing models of manufacturer net prices have focused on the aggregate discounts to all payers through analysis of financial statements and sales data.⁵⁴ However, our own historical analytics work on behalf of plan sponsors and numerous other studies have demonstrated that manufacturer price concessions are not equally distributed, which can make interpretation of the drug's net price difficult to contextualize. By studying net prices in the commercial market, we are providing a new way to approximate net pricing data in one of the largest U.S. healthcare segments – employer-sponsored health plans.

Further study is needed to compare commercial net prices to the aggregate net price experience to not only better understand and contextualize the role of best price provisions within the current market (most studies were undertaken a decade or more ago), but also to evaluate the role of new intermediaries, such as rebate aggregators, and whether they are contributing to a loss of value of manufacturer price concessions to end payers.

Recent policy maneuvers have delayed previously instituted changes to anti-kickback protections that enable drugmaker rebates, and it seems likely that the current delays could be extended further into the future.⁵⁵ The continued delay in this proposal may continue to result in some payers paying more for prescription medications, such as private Medicare Part D plans and commercial payers, such that other programs, like Medicaid and 340B covered entities, can secure the "best price". Future considerations to drug policy may benefit from increased focus on the degree to which select and limited parties are guaranteed a best price necessitates that others obtain a worse price. We are all too familiar with how the complexity and opacity of the U.S. healthcare system has been leveraged historically within the pharmacy channel to arbitrage price to the detriment of payers. Future research into the potential differential rebate payment experience seems warranted given that history.





Detailed Methodology

All analytics performed in this study were based on the combination of the following raw data sources:

- 1. CMS' Medicare Part D Dashboard database
- 2. Department of Veterans Affairs Federal Supply Schedule (FSS) Pricing database
- 3. Medi-Span PriceRx by Wolters Kluwer Clinical Drug Information Inc. (WKCDI)

Details regarding these sources and the transformations made to the base data are provided within this section.

Data Sources

CMS Medicare Part D database

CMS has released several datasets that provide greater transparency on spending for drugs in the Medicare program. The Medicare Part D Spending by Drug dataset presents information on spending for drugs prescribed to Medicare beneficiaries enrolled in Part D. Drug spending metrics provided in the dataset are based on the gross drug cost, which represents total spending for the prescription claim, including Medicare, plan, and beneficiary payments. The Part D spending metrics do not reflect any manufacturers' rebates or other price concessions, as CMS is prohibited from publicly disclosing such information. The data are summarized from 100% final-action Part D prescription drug claims. Prescription drug claims identified as "over-the-counter" are excluded.

For more details on the data see: https://data.cms.gov/

We relied upon the 46brooklyn Research copies of the CMS dataset, as it contained one additional year of data not currently housed on CMS' public website.⁵⁶

Department of Veterans Affairs Federal Supply Schedule (FSS) Pricing

Delegated authority by the General Services Administration (GSA), the VA supports the healthcare acquisition needs of various government agencies through the National Contract Service and ultimately the development of the Federal Supply Schedule (FSS) pricing for pharmaceuticals. At present, the VA manages nearly 1,700 contracts and approximately \$14 billion in annual sales. The FSS program negotiates firm-fixed pricing based on a commercial "most favored customer" pricing concept. It is important to note that the regulations governing "most favored customer" allows for the VA to ultimately set FSS pricing higher than this price given the potential variability that can exist within commercial contracts.

For more details on the data see: https://www.fss.va.gov/

Medi-Span PriceRx

Medi-Span PriceRx is an online pricing and drug information portal developed by Wolters Kluwer Clinical Drug Information, Inc. (WKCDI). PriceRx offers one of the most extensive histories of drug manufacturer pricing, with NDC-level drug pricing dating back to the 1980s. PriceRx was the source of the raw data that we used to source WACs for our analyses. PriceRx also contains clinical information that enables identification of drug products by a hierarchical therapeutic classification system. This classification helps standardize drug lists and is the basis for all therapeutic category investigations. It was used to identify brand vs. generic status, prescription drug status, and therapeutic drug classes, among other clinical information.



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

Medi-Span pricing information is not in the public domain and requires a subscription service to access the data and field descriptions.

Data Transformations

The following describes the transformations made to the data sources used in this report.

CMS Medicare Part D database

Aggregate CMS Part D gross drug spending is reported on a rolled-up product name basis. This means that the data is not national drug code (NDC) specific, nor does it confer the strength or dosage form. As a result, we developed a method to convert the stated drug name data into NDC codes through the use of the listed product names. As our analysis was focused on brand name drugs, the identification of these product names was a fairly straightforward process. Single word product names were identified based upon the text being contained within the product name field in Medi-Span. For products with more than one-word names within the Part D file, the combinations were matched to the product field. As only 100 therapies were targeted, all results were manually reviewed by a pharmacist for accuracy.

A list of associated NDCs to the listed brand names is included in Appendix A to this report.

Once the list of CMS Medicare Part D database drug names and NDCs was generated, it was a straightforward process to identify the net price estimate for the Part D claims to support our analysis.

VA FSS Pricing and Medi-Span WAC Analysis to Generate Net Pricing Estimates

The following SQL code was used to generate our net pricing estimate. The green text within each common table expression (CTE) describes the process in a step wise approach. We provide our code in its entirety to support replication of the results; however, it should be acknowledged that our database schemas and nomenclature may be different from another parties. We believe the terminology used is in plain text, sufficient to allow others to overcome this but are available to answer questions related to schemas and nomenclature as needed. Requests for clarification can be made via the Contact Us page at <u>www.3axisadvisors.com</u>.

WITH CTE AS (

/*****The VA FSS Pricing file contains information on both brand and generic medications. As a result, our first step was to use Medi-Span to generate a list of NDCs we were interested in based upon the products being licensed as BLAs or NDAs and not bearing a generic designation.*****/

SELECT NDC_UPC_HRI_Unformatted ,Product_Name ,GPI_Unformatted FROM Medi-Span Definitions Database where Drug_Application_Type_FDA in ('BLA','NDA') and Brand_Name_Code_BNC <> 'G') ,cte2 as (/******We limit the public VA pricing data to the NDCs of interest as well as query the data for just the FSS pricing (as the VA also publishes the Big 4 price). ******/

SELECT ndc ,Product_Name ,Price ,PriceType



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

```
,GPI_Unformatted
,Qty
,size
FROM Public Pricing Data VA Prices
JOIN Medi-Span Definitions Database b on a.ndc=b.NDC_UPC_HRI_Unformatted
where (Drug_Application_Type_FDA like 'NDA' or Drug_Application_Type_FDA like 'BLA') and (VA Price
date_updated between Medi-Span WAC Price begindate and enddate) and PriceType = 'FSS'
J
,cte3 as (
/*****We perform a clean-up step on our WAC pricing to ensure that end dates are appropriately
handled based upon our database schema.*****/
SELECT ndc11
  ,[BeginDate]
  ,CASE
        when [EndDate] is null then '2099-01-01'
        else EndDate
        end
        as [enddate]
  [UnitPrice]
        ,[PackagePrice]
FROM Medi-Span WAC Price
)
,cte4 AS (
/*****We limit WAC Medi-Span data to the NDCs of interest (i.e., brand products).*****/
SELECT *
FROM CTE3
where ndc11 in (Select ndc_upc_hri_unformatted from Medi-Span
                                                                          Definitions Database where
Drug_Application_Type_FDA in ('BLA','NDA'))
)
,cte5 as (
SELECT *
FROM cte4
where VA Price date_updated between BeginDate and EndDate
)
,cte6 as (
/*****We join Medi-Span and VA package price information together on a NDC basis.*****/
SELECT cte.*,convert(float,cte2.Price) as FSS,convert(float,cte5.PackagePrice) as WAC,cte2.Qty,cte2.Size
FROM CTE
LEFT JOIN cte2 on cte.NDC_UPC_HRI_Unformatted=cte2.ndc
Left JOin cte5 on cte.NDC_UPC_HRI_Unformatted=cte5.ndc11
where cte5.PackagePrice is not null
)
,cte7 as
/*****We identify NDCs on a therapeutic subclass basis as managed by Medi-Span GPI structure.
*****/
SELECT cte6.*,GPI_6_Subclass
FROM CTE6
JOIN
                       MediSpan.dbo.Definitions_20220608
                                                                            mddb
                                                                                                     on
cte6 NDC_UPC_HRI_Unformatted=mddb NDC_UPC_HRI_Unformatted
)
,cte8 as (
```

ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

/*****We identify the VA FSS pricing characteristics relative to WAC (i.e., FSS to WAC ratio) on a therapeutic subclass basis as managed by Medi-Span GPI structure.*****/

SELECT GPI_6_Subclass ,SUM(FSS)/SUM(WAC) FSS_ratio FROM cte7 WHERE FSS is not null group by GPI_6_Subclass)

/*****We build our net price estimate based upon the FSS price for the NDC, or in instances where the FSS price is not published, the FSS to WAC ratio of the NDC at the GPI subclass basis. *****/

SELECT NDC_UPC_HRI_Unformatted ,Product_Name ,GPI_Unformatted ,case when FSS is null then FSS_ratio * WAC else FSS end as NET_PRICE_EST ,case when wac < 400 then 0.49 * WAC when wac >= 400 and wac < 700 then 0.56 * WAC when wac >= 700 and wac <2500 then 0.68 * WAC when wac >= 2500 and wac <10000 then 0.85 * WAC else 0.89 * WAC end as WAC_NET_EST FSS ,WAC ,FSS_ratio FROM cte7 join cte8 on cte7.GPI_6_Subclass=cte8.GPI_6_Subclass



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

Data Validations

In developing our VA FSS pricing database for this project, we used a web scraper to pull down VA pricing files on a recurring basis (twice per month). In compiling the results of the pricing files, we performed some data validation, as we were unfamiliar with the VA pricing files and had not previously worked with them. Our first analysis focused on the number of NDCs associated with each contract ID identified in the data. As can be seen from the following data, the 25th percentile of contracts have just 1 NDC associated with the contract ID, the 50th percentile of contracts have 6 NDCs or fewer associated with them, and the 90th percentile of contracts have 116 or fewer NDCs associated with them.

"x" Percentile of Contracts	Have "y" Or Fewer NDCs
25	1
50	6
75	37
90	116

Table 4: Analysis of NDCs per Contract in VA FSS Pricing

The largest contract at the time of our analysis was Contract Number 36F79718D0318, which had 1,953 NDCs under the contract.

We noticed that the reported FSS pricing can be variable for a drug over time. According to the FSS regulations, we expect some potential variability in price based on the allowance that price can increase at the rate of CPI. However, it is difficult to assess whether this requirement is being adhered to based on variability in aspects of the contract over time. While the data file includes contract start and stop dates alongside pricing start and stop dates, one of our first observations was that there were numerous instances (n = 12,765) where the pricing start date value preceded the contract start date. These preceding pricing dates ranged from 1 day prior to contract start date to 29,585 days. We summarize our observations of these occurrences in the following table:

Table 5: FSS Pricing Predating	Contract Analysis
---------------------------------------	-------------------

Number of Days Predating Contract Start Date	Number of NDC events
1 to 10	36
11 to 50	726
50 to 100	516
100 to 200	1,669
200 to 500	3,341
500 to 1000	4,581
Greater than 1000	1,896



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES Alternatives to existing net price estimates based upon federal supply schedule (FSS) pricing We do not know how to explain these occurrences. It is unclear how a price beginning before the contract start date would be enforceable. It seems unlikely that contract negotiations would result in retrospective price changes on prior purchases, but that is one possible interpretation of the data.

Upon further exploring the data, we noticed that there were times when the contract number associated with a NDC changed over the course of the various updates. While it is expected that contracts would be updated based upon prevailing market conditions, new products entering the market, or even the sale of rights to market a medication between manufacturers, the number of NDCs associated with various contracts across the historical VA pricing files was noteworthy. The following table summarizes the number of products associated with the varying amount of contract IDs.

Count of Contract IDs	Distinct Count of NDC 11 Values
1	22,948
2	11,974
3	3,971
4	550
5	81
6	12
7	7

Table 6: ContractID Variability Across NDC

We explored ways to account for the variability we were seeing. These included, but were not limited to, assessments of contract length to attempt to derive from the data if there were obvious factors resulting in a change (i.e., the pricing type, the VA classification, formulary status of the medication, etc.), as well as assessments related to the first occurrence of a drug's prices within the FSS system to its current FSS price. None of these analyses seemed definitive or overly informative in data. Ultimately, without greater transparency into VA prices for managing FSS pricing, we relied upon the VA data on an "as is" basis in regards to the accuracy of the "most favored" commercial price.



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES Alternatives to existing net price estimates based upon federal supply schedule (FSS) pricing

Limitations

As with all analysis of data, our assumptions around the data confer certain limitations in interpreting the results of our study. The first assumption made in our analysis was regarding the identification of brand and generic medications. There is no industry standard definition for brand and generic, as the U.S. Food and Drug Administration (FDA), nor any other federal agency, identifies or regulates a medication on a brand or generic basis. Rather, brand and generics are terms of convenience to discuss the segment nature of the U.S. drug supply system. Our determination of brand vs generic prescription was based on data fields extracted from the Medi-Span database. Because of a lack of a standard definition of what classifies a NDC as brand or generic, it is possible and highly likely that some transactions that are classified as brand may be considered generic by the payer and vice versa. However, as we have identified in our prior work⁵⁷, our ability to approximate brand and generic appears to closely mirror that of the federal government given the similarities in brand percentages identified between the 46brooklyn and CBO analyses of Part D data. We therefore feel this limitation is appropriately addressed.

Along the same lines, we are using aggregate Medicare drug pricing data, which is not NDC specific. Our net price estimate is on an NDC basis; therefore, we have to align the aggregate Medicare data to an NDC-specific set of products. We believe that the aggregate experience of drugs within a manufacturer owned and exclusive product (i.e., brand) enables us to accurately identify the representative group of NDCs to the aggregate Medicare data. Furthermore, because we are relying on a small subset of products (the Top 200), we were able to perform manual confirmation of the matches generated in a reasonably robust way to minimize human errors. Given that our findings align with prior government studies in this space, whose agencies have access to individualized NDCspecific data, we feel that the similarity is sufficient to support our contention that this limitation is appropriately addressed.

Finally, our data relies upon a study of pricing files we have not previously studied at length, nor do any members of 3 Axis Advisors, LLC have comprehensive prior experience working with; namely, the FSS pricing as published by the VA. We spent an extensive amount of time researching the regulations governing the FSS pricing at large, and as specifically managed by the VA, we do not claim expertise in the operation or publication of VA prices. While we attempted to validate the VA prices to the regulations we reviewed, we found some level of variability that we could not fully explain based on quantitative analyses. Ultimately, we accepted the VA pricing data for use in our analysis on an "as is" basis. Our discussion section reflects that we feel that knowledge of commercial "most favored" nations, while beneficial to research, may not be appropriate to use on a case-by-case or individualized basis. The U.S. drug supply chain is highly segmented, and there are known reasons why pricing can vary from entity-to-entity.



About 3 Axis Advisors LLC

3 Axis Advisors is an elite, highly specialized consultancy that partners with private and government sector organizations to solve complex, systemic problems and propel industry reform through data driven advocacy. With a primary focus on identifying and analyzing U.S. drug supply chain inefficiencies and cost drivers, 3 Axis Advisors offers unparalleled expertise in project design, data aggregation and analysis, investigative research, and public education. 3 Axis Advisors arms clients with independent data analysis needed to spur change and innovation within their respective industries. 3 Axis Advisors co-founders were instrumental in exposing the drug pricing distortions and supply chain inefficiencies embedded in Ohio's Medicaid managed care program that ultimately uncovered more than \$244 million in secret prescription drug mark-ups and inspired a national reckoning on hidden cost drivers within the prescription drug supply chain. They are also the co-founders of 46brooklyn Research, a nonprofit organization dedicated to improving the transparency and accessibility of drug pricing data for the American public.

To learn more about 3 Axis Advisors, visit <u>www.3axisadvisors.com</u>.





ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

Acknowledgements

We are immensely grateful for Arnold Ventures for the financial resources that supported this work. If it were not for them, there would be little funding available for exploratory research and analysis of the U.S. prescription drug supply chain.

Additionally, we would like to thank the many drugmakers, pharmacy benefit managers, government officials, and researchers across the country who have helped provide some degree of transparency into net drug pricing information and inform a better understanding of the dynamics at play in the supply chain for this report and our previous work as well.

We would also like to thank the many members of the media, whose work created a more accessible narrative of drug pricing information than our lengthy works can. If not for the important work of journalists, much of all drug pricing research would not be available for those that need it.



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

Appendix A - Medicare Part D Database NDC Match List

Appendix A – Medicare Part D Datak NDC_UPC_HRI_Unformatted Product_Name	00023611001 Zenpep Oral Capsule Delayed Release
00002143301 Trulicity Subcutaneous Solution Pen-	Particles 10000-32000 UNIT
injector 0.75 MG/0.5ML	00023611101 Zenpep Oral Capsule Delayed Release Particles 15000-47000 UNIT
00002143380 Trulicity Subcutaneous Solution Pen- injector 0.75 MG/0.5ML	00023611201 Zenpep Oral Capsule Delayed Release Particles 20000-63000 UNIT
00002143401 Trulicity Subcutaneous Solution Pen- injector 1.5 MG/0.5ML	00023611301 Zenpep Oral Capsule Delayed Release
00002143480 Trulicity Subcutaneous Solution Pen- injector 1.5 MG/0.5ML	Particles 3000-10000 UNIT 00023611401 Zenpep Oral Capsule Delayed Release
00002144501 Taltz Subcutaneous Solution Auto-injector 80 MG/ML	Particles 40000-126000 UNIT 00023611501 Zenpep Oral Capsule Delayed Release
00002144509 Taltz Subcutaneous Solution Auto-injector	Particles 5000-24000 UNIT
80 MG/ML	00023611601 Zenpep Oral Capsule Delayed Release Particles 25000-79000 UNIT
00006007861 Janumet XR Oral Tablet Extended Release 24 Hour 50-500 MG	00002223601 Trulicity Subcutaneous Solution Pen-
00006007862 Janumet XR Oral Tablet Extended Release	injector 3 MG/0.5ML
24 Hour 50-500 MG	00002223680 Trulicity Subcutaneous Solution Pen- injector 3 MG/0.5ML
00006007882 Janumet XR Oral Tablet Extended Release 24 Hour 50-500 MG	00006022101 Januvia Oral Tablet 25 MG
00006008028 Janumet XR Oral Tablet Extended Release 24 Hour 50-1000 MG	00002318201 Trulicity Subcutaneous Solution Pen- injector 4.5 MG/0.5ML
00006008061 Janumet XR Oral Tablet Extended Release 24 Hour 50-1000 MG	00006022128 Januvia Oral Tablet 25 MG
00006008062 Janumet XR Oral Tablet Extended Release	00006022131 Januvia Oral Tablet 25 MG
24 Hour 50-1000 MG	00006022154 Januvia Oral Tablet 25 MG
00006008082 Janumet XR Oral Tablet Extended Release 24 Hour 50-1000 MG	00002318280 Trulicity Subcutaneous Solution Pen- injector 4.5 MG/0.5ML
00006008114 Janumet XR Oral Tablet Extended Release 24 Hour 100-1000 MG	00006022761 Isentress Oral Tablet 400 MG
00006008131 Janumet XR Oral Tablet Extended Release	00006027701 Januvia Oral Tablet 100 MG
24 Hour 100-1000 MG	00006027702 Januvia Oral Tablet 100 MG
00006008154 Janumet XR Oral Tablet Extended Release 24 Hour 100-1000 MG	00006027728 Januvia Oral Tablet 100 MG
00006008182 Janumet XR Oral Tablet Extended Release	00006027731 Januvia Oral Tablet 100 MG
24 Hour 100-1000 MG	00006027754 Januvia Oral Tablet 100 MG
00006011201 Januvia Oral Tablet 50 MG	00006027782Januvia Oral Tablet 100 MG00006047361Isentress Oral Tablet Chewable 25 MG
00006011228 Januvia Oral Tablet 50 MG	00000047301 Isentress Oral Tablet Chewable 25 MG 00006047761 Isentress Oral Tablet Chewable 100 MG
00006011231 Januvia Oral Tablet 50 MG	00023916330 Restasis Ophthalmic Emulsion 0.05 %
00006011254 Januvia Oral Tablet 50 MG	00023916360Restasis Ophthalmic Emulsion 0.05 %
00002144511 Taltz Subcutaneous Solution Auto-injector 80 MG/ML	00023917705 Alphagan P Ophthalmic Solution 0.15 %
00002144527 Taltz Subcutaneous Solution Auto-injector 80 MG/ML	00023917710Alphagan P Ophthalmic Solution 0.15 %

ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

00023917715	Alphagan P Ophthalmic Solution 0.15 %	00024590101 Praluent Subcutaneous Solution Auto-
00023921105	Combigan Ophthalmic Solution 0.2-0.5 %	injector 75 MG/ML
00006057503	Janumet Oral Tablet 50-500 MG	00024590102 Praluent Subcutaneous Solution Auto- injector 75 MG/ML
00023921110	Combigan Ophthalmic Solution 0.2-0.5 %	00024590201 Praluent Subcutaneous Solution Auto-
00023921115	Combigan Ophthalmic Solution 0.2-0.5 %	injector 150 MG/ML
00006057561	Janumet Oral Tablet 50-500 MG	00024590202 Praluent Subcutaneous Solution Auto- injector 150 MG/ML
00006057562	Janumet Oral Tablet 50-500 MG	00002771201 HumaLOG KwikPen Subcutaneous
00006057582	Janumet Oral Tablet 50-500 MG	Solution Pen-injector 200 UNIT/ML
00006057761	Janumet Oral Tablet 50-1000 MG	00002771227 HumaLOG KwikPen Subcutaneous Solution Pen-injector 200 UNIT/ML
00006057762	Janumet Oral Tablet 50-1000 MG	00002771501 Basaglar KwikPen Subcutaneous Solution
00006057782	Janumet Oral Tablet 50-1000 MG	Pen-injector 100 UNIT/ML
00023932105	Alphagan P Ophthalmic Solution 0.1 %	00002771559 Basaglar KwikPen Subcutaneous Solution Pen-injector 100 UNIT/ML
00023932110	Alphagan P Ophthalmic Solution 0.1 %	00024591401 Dupixent Subcutaneous Solution Prefilled
00023932115	Alphagan P Ophthalmic Solution 0.1 %	Syringe 300 MG/2ML
00024414210	Multaq Oral Tablet 400 MG	00024591502 Dupixent Subcutaneous Solution Pen-
00024414260	Multaq Oral Tablet 400 MG	injector 300 MG/2ML
00002448354	Verzenio Oral Tablet 50 MG	00024591520 Dupixent Subcutaneous Solution Pen- injector 300 MG/2ML
00002481554	Verzenio Oral Tablet 100 MG	00024591801 Dupixent Subcutaneous Solution Prefilled
00002533754	Verzenio Oral Tablet 150 MG	Syringe 200 MG/1.14ML
00002621654	Verzenio Oral Tablet 200 MG	00024591900 Dupixent Subcutaneous Solution Pen- injector 200 MG/1.14ML
00002751001 UNIT/ML	HumaLOG Injection Solution 100	00024591902 Dupixent Subcutaneous Solution Pen- injector 200 MG/1.14ML
00002751017 UNIT/ML	HumaLOG Injection Solution 100	00024591920 Dupixent Subcutaneous Solution Pen- injector 200 MG/1.14ML
00006308001	Isentress HD Oral Tablet 600 MG	00024592410 Admelog Injection Solution 100 UNIT/ML
00024586900 Pen-injector 300 U	Toujeo SoloStar Subcutaneous Solution NIT/ML	00024592500 Admelog SoloStar Subcutaneous Solution Pen-injector 100 UNIT/ML
00024586901 Pen-injector 300 U	Toujeo SoloStar Subcutaneous Solution NIT/ML	00024592501 Admelog SoloStar Subcutaneous Solution Pen-injector 100 UNIT/ML
00024586903 Pen-injector 300 U	Toujeo SoloStar Subcutaneous Solution NIT/ML	00024592505 Admelog SoloStar Subcutaneous Solution Pen-injector 100 UNIT/ML
00006360301	Isentress Oral Packet 100 MG	00024592605 Admelog Injection Solution 100 UNIT/ML
00006360360	Isentress Oral Packet 100 MG	00002840001 Forteo Subcutaneous Solution Pen-
00024587100 Solution Pen-inject	Toujeo Max SoloStar Subcutaneous or 300 UNIT/ML	injector 600 MCG/2.4ML 00002871501 HumuLIN 70/30 Subcutaneous
00006360361	Isentress Oral Packet 100 MG	Suspension (70-30) 100 UNIT/ML
00024587102 Solution Pen-inject	Toujeo Max SoloStar Subcutaneous or 300 UNIT/ML	00002871517 HumuLIN 70/30 Subcutaneous Suspension (70-30) 100 UNIT/ML

ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

3/

00002879701 HumaLOG Mix 75/25 KwikPen Subcutaneous Suspension Pen-injector (75-25) 100 UNIT/ML	00023320503 Lumigan Ophthalmic Solution 0.01 %
	00023320505 Lumigan Ophthalmic Solution 0.01 %
00002879759 HumaLOG Mix 75/25 KwikPen Subcutaneous Suspension Pen-injector (75-25) 100 UNIT/ML	00023320508 Lumigan Ophthalmic Solution 0.01 %
00002879901 HumaLOG KwikPen Subcutaneous Solution Pen-injector 100 UNIT/ML	00032120370 Creon Oral Capsule Delayed Release Particles 3000-9500 UNIT
00002879959 HumaLOG KwikPen Subcutaneous Solution Pen-injector 100 UNIT/ML	00032120601 Creon Oral Capsule Delayed Release Particles 6000-19000 UNIT
00002880301 HumuLIN 70/30 KwikPen Subcutaneous Suspension Pen-injector (70-30) 100 UNIT/ML	00032120607 Creon Oral Capsule Delayed Release Particles 6000-19000 UNIT
00002880359 HumuLIN 70/30 KwikPen Subcutaneous Suspension Pen-injector (70-30) 100 UNIT/ML	00032121201 Creon Oral Capsule Delayed Release Particles 12000-38000 UNIT
00002882401 HumuLIN R U-500 KwikPen Subcutaneous Solution Pen-injector 500 UNIT/ML	00032121207 Creon Oral Capsule Delayed Release Particles 12000-38000 UNIT
00002882427 HumuLIN R U-500 KwikPen Subcutaneous Solution Pen-injector 500 UNIT/ML	00032122401 Creon Oral Capsule Delayed Release Particles 24000-76000 UNIT
00003052411 Sprycel Oral Tablet 70 MG	00032122407 Creon Oral Capsule Delayed Release Particles 24000-76000 UNIT
00003052711Sprycel Oral Tablet 20 MG00003052811Sprycel Oral Tablet 50 MG	00032301613 Creon Oral Capsule Delayed Release Particles 36000-114000 UNIT
00003085222 Sprycel Oral Tablet 100 MG	00032301628 Creon Oral Capsule Delayed Release
00003085522 Sprycel Oral Tablet 80 MG	Particles 36000-114000 UNIT
00003085722 Sprycel Oral Tablet 140 MG	00023530101 Restasis MultiDose Ophthalmic Emulsion 0.05 %
00003089321 Eliquis Oral Tablet 2.5 MG	00023530105 Restasis MultiDose Ophthalmic Emulsion
00003089331 Eliquis Oral Tablet 2.5 MG	0.05 %
00003089421 Eliquis Oral Tablet 5 MG	00065027510 Azopt Ophthalmic Suspension 1 %
00003089431 Eliquis Oral Tablet 5 MG	00065027515 Azopt Ophthalmic Suspension 1 %
00003089470 Eliquis Oral Tablet 5 MG	00069014501 Inlyta Oral Tablet 1 MG
00003218710 Orencia Intravenous Solution	00069015111 Inlyta Oral Tablet 5 MG
Reconstituted 250 MG	00069018721 Ibrance Oral Capsule 75 MG
00003218713 Orencia Intravenous Solution Reconstituted 250 MG	00069018821 Ibrance Oral Capsule 100 MG
00003218811 Orencia Subcutaneous Solution Prefilled	00069018921 Ibrance Oral Capsule 125 MG
Syringe 125 MG/ML	00046074905Premarin Injection Solution Reconstituted25 MG
00003218851 Orencia ClickJect Subcutaneous Solution Auto-injector 125 MG/ML	00046087221 Premarin Vaginal Cream 0.625 MG/GM
00003281411 Orencia Subcutaneous Solution Prefilled	00046110081 Premarin Oral Tablet 0.3 MG
Syringe 50 MG/0.4ML	00046110091 Premarin Oral Tablet 0.3 MG
00003281811 Orencia Subcutaneous Solution Prefilled Syringe 87.5 MG/0.7ML	00046110181 Premarin Oral Tablet 0.45 MG
00003376474 Eliquis DVT/PE Starter Pack Oral Tablet	00046110281 Premarin Oral Tablet 0.625 MG
Therapy Pack 5 MG	00046110291 Premarin Oral Tablet 0.625 MG
00023320502 Lumigan Ophthalmic Solution 0.01 %	00046110381 Premarin Oral Tablet 0.9 MG

ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

00069024230	Toviaz Oral Tablet Extended Release 24	00071101668	Lyrica Oral Capsule 150 MG
Hour 4 MG	Denver de Oselmeller 4 25 MC	00071101768	Lyrica Oral Capsule 200 MG
00046110481	Premarin Oral Tablet 1.25 MG	00071101868	Lyrica Oral Capsule 300 MG
00069024430 Hour 8 MG	Toviaz Oral Tablet Extended Release 24	00071101968	Lyrica Oral Capsule 225 MG
00046110491	Premarin Oral Tablet 1.25 MG	00071102001	Lyrica Oral Solution 20 MG/ML
00069028403	Ibrance Oral Tablet 75 MG	00071102601 Hour 82.5 MG	Lyrica CR Oral Tablet Extended Release 24
00069028407	Ibrance Oral Tablet 75 MG	00078056651	Afinitor Oral Tablet 5 MG
00069046856	Chantix Oral Tablet 0.5 MG	00078056661	Afinitor Oral Tablet 5 MG
00069046903 1 MG	Chantix Continuing Month Pak Oral Tablet	00078056751	Afinitor Oral Tablet 10 MG
00069046956	Chantix Oral Tablet 1 MG	00071102701 Hour 165 MG	Lyrica CR Oral Tablet Extended Release 24
00069047103 MG X 11 & 1 MG X 4	Chantix Starting Month Pak Oral Tablet 0.5 2	00078056761	Afinitor Oral Tablet 10 MG
00069048603	Ibrance Oral Tablet 100 MG	00071102901 Hour 330 MG	Lyrica CR Oral Tablet Extended Release 24
00069048607	Ibrance Oral Tablet 100 MG	00078056912	Extavia Subcutaneous Kit 0.3 MG
00069050114 24 Hour 11 MG	Xeljanz XR Oral Tablet Extended Release	00078056961	Extavia Subcutaneous Kit 0.3 MG
00069050130	Xeljanz XR Oral Tablet Extended Release	00078056999	Extavia Subcutaneous Kit 0.3 MG
24 Hour 11 MG		00078059251	Tasigna Oral Capsule 150 MG
00069050230 24 Hour 22 MG	Xeljanz XR Oral Tablet Extended Release	00078059287	Tasigna Oral Capsule 150 MG
00069068803	Ibrance Oral Tablet 125 MG	00078059451	Afinitor Oral Tablet 2.5 MG
00069068807	Ibrance Oral Tablet 125 MG	00069873001	Vyndamax Oral Capsule 61 MG
00069100101	Xeljanz Oral Tablet 5 MG	00078059461	Afinitor Oral Tablet 2.5 MG
00069100201	Xeljanz Oral Tablet 10 MG		
00069102902	Xeljanz Oral Solution 1 MG/ML		
00069197512	Vyndaqel Oral Capsule 20 MG	00078060715	Gilenya Oral Capsule 0.5 MG
00069197540	Vyndaqel Oral Capsule 20 MG	00074012402 Kit 80 MG/0.8ML	Humira Pen Subcutaneous Pen-injector
00078052651	Tasigna Oral Capsule 200 MG	00078060789	Gilenya Oral Capsule 0.5 MG
00078052687	Tasigna Oral Capsule 200 MG	00074012403	Humira Pen-CD/UC/HS Starter
00071101268	Lyrica Oral Capsule 25 MG	00074012403 Humira Pen-CD/0C/HS Starter Subcutaneous Pen-injector Kit 80 MG/0.8ML	
00071101341	Lyrica Oral Capsule 50 MG	00069873030	Vyndamax Oral Capsule 61 MG
00071101368	Lyrica Oral Capsule 50 MG	00074012404	Humira Pen-Pediatric UC Start
00071101441	Lyrica Oral Capsule 75 MG		injector Kit 80 MG/0.8ML
00071101468	Lyrica Oral Capsule 75 MG	00074012474 Subcutaneous Pen-i	Humira Pen-CD/UC/HS Starter injector Kit 80 MG/0.8ML
00071101541	Lyrica Oral Capsule 100 MG	00074024302	Humira Subcutaneous Prefilled Syringe Kit
00071101568	Lyrica Oral Capsule 100 MG	40 MG/0.4ML	
00071101641	Lyrica Oral Capsule 150 MG	00078062051	Afinitor Oral Tablet 7.5 MG



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

00078062061 Afinitor Oral Tablet 7.5 MG	00074254003 Humira Pediatric Crohns Start Subcutaneous Prefilled Syringe Kit 80 MG/0.8ML
00078062651 Afinitor Disperz Oral Tablet Soluble 2	2 MG
00078062661 Afinitor Disperz Oral Tablet Soluble 2	2 MG
00078062751 Afinitor Disperz Oral Tablet Soluble	
00078062761 Afinitor Disperz Oral Tablet Soluble	
00078062851 Afinitor Disperz Oral Tablet Soluble	
00078062861 Afinitor Disperz Oral Tablet Soluble	
00074055402 Humira Pen Subcutaneous Pen-in	00078068515 Promacta Oral Tablet 25 MG jector
Kit 40 MG/0.4ML	00078068615 Promacta Oral Tablet 50 MG
00074055471 Humira Pen Subcutaneous Pen-in Kit 40 MG/0.4ML	jector 00078068655 Promacta Oral Tablet 50 MG
00074056111 Venclexta Oral Tablet 10 MG	00078068715 Promacta Oral Tablet 75 MG
00074056114 Venclexta Oral Tablet 10 MG	00078069620 Entresto Oral Tablet 97-103 MG
00074056607 Venclexta Oral Tablet 10 MG	00078069635 Entresto Oral Tablet 97-103 MG
	00078069661 Entresto Oral Tablet 97-103 MG
00074056611 Venclexta Oral Tablet 50 MG	00078069667 Entresto Oral Tablet 97-103 MG
00074057611 Venclexta Oral Tablet 100 MG	00078069719 Promacta Oral Packet 25 MG
00074057622 Venclexta Oral Tablet 100 MG	00074372719 Synthroid Oral Tablet 137 MCG
00074057634 Venclexta Oral Tablet 100 MG	00078069761 Promacta Oral Packet 25 MG
00074057928 Venclexta Starting Pack Oral 7 Therapy Pack 10 & 50 & 100 MG	'ablet 00074372790 Synthroid Oral Tablet 137 MCG
00074061602 Humira Subcutaneous Prefilled Syrin 20 MG/0.2ML	ge Kit 00074379902 Humira Subcutaneous Prefilled Syringe Kit 40 MG/0.8ML
00074081702 Humira Subcutaneous Prefilled Syrin 10 MG/0.1ML	ge Kit 00074379903 Humira Pediatric Crohns Start Subcutaneous Prefilled Syringe Kit 40 MG/0.8ML
00078063968 Cosentyx Sensoready Pen Subcuta Solution Auto-injector 150 MG/ML	neous 00074379906 Humira Pediatric Crohns Start Subcutaneous Prefilled Syringe Kit 40 MG/0.8ML
00074153903 Humira Pen-Psor/Uveit S Subcutaneous Pen-injector Kit 80 MG/0.8ML & 40MG/0.4	tarter 00078070151 Piqray (200 MG Daily Dose) Oral Tablet ML Therapy Pack 200 MG
00074204202 Skyrizi (150 MG Dose) Subcuta: Prefilled Syringe Kit 75 MG/0.83ML	neous 00078070184 Piqray (200 MG Daily Dose) Oral Tablet Therapy Pack 200 MG
00074204271 Skyrizi (150 MG Dose) Subcuta Prefilled Syringe Kit 75 MG/0.83ML	neous 00078070802 Piqray (300 MG Daily Dose) Oral Tablet Therapy Pack 2 x 150 MG
00078065920 Entresto Oral Tablet 24-26 MG	00074433902 Humira Pen Subcutaneous Pen-injector Kit 40 MG/0.8ML
00078065935 Entresto Oral Tablet 24-26 MG	00078070851 Pigray (300 MG Daily Dose) Oral Tablet
00078065961 Entresto Oral Tablet 24-26 MG	Therapy Pack 2 x 150 MG
00074230630 Rinvoq Oral Tablet Extended Relea Hour 15 MG	se 24 00074433906 Humira Pen-CD/UC/HS Starter Subcutaneous Pen-injector Kit 40 MG/0.8ML
00078065967 Entresto Oral Tablet 24-26 MG	00074433907 Humira Pen-Ps/UV/Adol HS Start
00074230670 Rinvoq Oral Tablet Extended Relea	
Hour 15 MG	00074434119 Synthroid Oral Tablet 25 MCG

3/

ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

00074434190 S	Synthroid Oral Tablet 25 MCG	00074714819	Synthroid Oral Tablet 200 MCG
	Piqray (250 MG Daily Dose) Oral Tablet	00074714890	Synthroid Oral Tablet 200 MCG
Therapy Pack 200 & 5		00074714919	Synthroid Oral Tablet 300 MCG
00078071561 F Therapy Pack 200 & 5	² iqray (250 MG Daily Dose) Oral Tablet 0 MG	00074714990	Synthroid Oral Tablet 300 MCG
00078072210 A	Azopt Ophthalmic Suspension 1 %	00074929619	Synthroid Oral Tablet 112 MCG
00078077720 E	Entresto Oral Tablet 49-51 MG	00074929690	Synthroid Oral Tablet 112 MCG
00078077735 E	Entresto Oral Tablet 49-51 MG	00085113201	Proventil HFA Inhalation Aerosol Solution
00078077761 E	Entresto Oral Tablet 49-51 MG	108 (90 Base) MCG/	
00078077767 E	Entresto Oral Tablet 49-51 MG	00085113204 108 (90 Base) MCG/	Proventil HFA Inhalation Aerosol Solution ACT
00074455211 S	Synthroid Oral Tablet 50 MCG	00088221900	Lantus SoloStar Subcutaneous Solution
00074455219 S	Synthroid Oral Tablet 50 MCG	Pen-injector 100 UN	
00074455290 S	Synthroid Oral Tablet 50 MCG	00088221901 Pen-injector 100 UN	Lantus SoloStar Subcutaneous Solution IT/ML
00074518211 S	Synthroid Oral Tablet 75 MCG	00088221905	Lantus SoloStar Subcutaneous Solution
00074518219 S	Synthroid Oral Tablet 75 MCG	Pen-injector 100 UN	IT/ML
00074518290 S	Synthroid Oral Tablet 75 MCG	00088222033 UNIT/ML	Lantus Subcutaneous Solution 100
00078091105 X	Kiidra Ophthalmic Solution 5 %	00088502001	Lantus SoloStar Subcutaneous Solution
00078091112 X	Kiidra Ophthalmic Solution 5 %	Pen-injector 100 UN	IT/ML
00074659419 S	Synthroid Oral Tablet 88 MCG	00088502005 Pen-injector 100 UN	Lantus SoloStar Subcutaneous Solution IT/ML
00074659490 S	Synthroid Oral Tablet 88 MCG	00088502101	Lantus Subcutaneous Solution 100
00074662411 S	Synthroid Oral Tablet 100 MCG	UNIT/ML	
00074662419 S	Synthroid Oral Tablet 100 MCG	00131181067 MG/20ML	Vimpat Intravenous Solution 200
00074662490 S	Synthroid Oral Tablet 100 MCG	00131247735	Vimpat Oral Tablet 50 MG
00078095166 7	Fasigna Oral Capsule 50 MG	00131247760	Vimpat Oral Tablet 50 MG
00074706811 S	Synthroid Oral Tablet 125 MCG	00131247700	Vimpat Oral Tablet 100 MG
00074706819 S	Synthroid Oral Tablet 125 MCG	00131247860	Vimpat Oral Tablet 100 MG
00078097219 F	Promacta Oral Packet 12.5 MG	00131247880	Vimpat Oral Tablet 150 MG
00078097223 F	Promacta Oral Packet 12.5 MG	00131247955	Vimpat Oral Tablet 150 MG
00074706890 S	Synthroid Oral Tablet 125 MCG	00131247900	Vimpat Oral Tablet 200 MG
00078097261 F	Promacta Oral Packet 12.5 MG	00131248060	Vimpat Oral Tablet 200 MG
00074706911 S	Synthroid Oral Tablet 150 MCG	00131248000	Vimpat Oral Solution 10 MG/ML
00074706919 S	Synthroid Oral Tablet 150 MCG	00131541070	Vimpat Oral Solution 10 MG/ML
00074706990 S	Synthroid Oral Tablet 150 MCG	00131541071	Vimpat Oral Solution 10 MG/ML
00074707019 S	Synthroid Oral Tablet 175 MCG	00131341072	Breo Ellipta Inhalation Aerosol Powder
00074707090 S	Synthroid Oral Tablet 175 MCG	Breath Activated 10	-
00074714811 S	Synthroid Oral Tablet 200 MCG	00173085914 Breath Activated 100	Breo Ellipta Inhalation Aerosol Powder 0-25 MCG/INH



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

00173086906 Anoro Ellipta Inhalation Aerosol Powder Breath Activated 62.5-25 MCG/INH

00173086910 Anoro Ellipta Inhalation Aerosol Powder Breath Activated 62.5-25 MCG/INH

00173087306 Incruse Ellipta Inhalation Aerosol Powder Breath Activated 62.5 MCG/INH

00173087310 Incruse Ellipta Inhalation Aerosol Powder Breath Activated 62.5 MCG/INH

00173088210 Breo Ellipta Inhalation Aerosol Powder Breath Activated 200-25 MCG/INH

00173088214 Breo Ellipta Inhalation Aerosol Powder Breath Activated 200-25 MCG/INH

00173088710 Trelegy Ellipta Inhalation Aerosol Powder Breath Activated 100-62.5-25 MCG/INH

00173088714 Trelegy Ellipta Inhalation Aerosol Powder Breath Activated 100-62.5-25 MCG/INH

00173089310 Trelegy Ellipta Inhalation Aerosol Powder Breath Activated 200-62.5-25 MCG/INH

00173089314 Trelegy Ellipta Inhalation Aerosol Powder Breath Activated 200-62.5-25 MCG/INH

00173089361 Trelegy Ellipta Inhalation Aerosol Powder Breath Activated 200-62.5-25 MCG/INH

00169183702 NovoLIN 70/30 ReliOn Subcutaneous Suspension (70-30) 100 UNIT/ML

00169183711 NovoLIN 70/30 Subcutaneous Suspension (70-30) 100 UNIT/ML

00169210011 NovoLOG ReliOn Injection Solution 100 UNIT/ML

00169210125 NovoLOG FlexPen ReliOn Subcutaneous Solution Pen-injector 100 UNIT/ML

00169220125 NovoLOG 70/30 FlexPen ReliOn Subcutaneous Suspension Pen-injector (70-30) 100 UNIT/ML

00169255013 Tresiba FlexTouch Subcutaneous Solution
Pen-injector 200 UNIT/ML

00169266015 Tresiba FlexTouch Subcutaneous Solution
Pen-injector 100 UNIT/ML

00169300701 NovoLIN 70/30 FlexPen Subcutaneous Suspension Pen-injector (70-30) 100 UNIT/ML

00169300712 NovoLIN 70/30 FlexPen Relion Subcutaneous Suspension Pen-injector (70-30) 100 UNIT/ML

00169300715 NovoLIN 70/30 FlexPen Subcutaneous Suspension Pen-injector (70-30) 100 UNIT/ML

00169300725 NovoLIN 70/30 FlexPen Relion Subcutaneous Suspension Pen-injector (70-30) 100 UNIT/ML

00169368712 Levemir Subcutaneous Solution 100 UNIT/ML 00169369619 NovoLOG Mix 70/30 FlexPen Subcutaneous Suspension Pen-injector (70-30) 100 UNIT/ML

00169406012 Victoza Subcutaneous Solution Peninjector 18 MG/3ML

00169406013 Victoza Subcutaneous Solution Peninjector 18 MG/3ML

00169413001 Ozempic (1 MG/DOSE) Subcutaneous Solution Pen-injector 4 MG/3ML

00169413013 Ozempic (1 MG/DOSE) Subcutaneous Solution Pen-injector 4 MG/3ML

00169413211 Ozempic (0.25 or 0.5 MG/DOSE) Subcutaneous Solution Pen-injector 2 MG/1.5ML

00169413212 Ozempic (0.25 or 0.5 MG/DOSE) Subcutaneous Solution Pen-injector 2 MG/1.5ML

00169413602 Ozempic (1 MG/DOSE) Subcutaneous Solution Pen-injector 2 MG/1.5ML

00169413611 Ozempic (1 MG/DOSE) Subcutaneous Solution Pen-injector 2 MG/1.5ML

00169633910 NovoLOG FlexPen Subcutaneous Solution Pen-injector 100 UNIT/ML

00169643810 Levemir FlexTouch Subcutaneous Solution Pen-injector 100 UNIT/ML

00169750111 NovoLOG Injection Solution 100 UNIT/ML

00173068220 Ventolin HFA Inhalation Aerosol Solution 108 (90 Base) MCG/ACT

00173068224 Ventolin HFA Inhalation Aerosol Solution 108 (90 Base) MCG/ACT

00173069500 Advair Diskus Inhalation Aerosol Powder Breath Activated 100-50 MCG/ACT

00173069504 Advair Diskus Inhalation Aerosol Powder Breath Activated 100-50 MCG/ACT

00173069600 Advair Diskus Inhalation Aerosol Powder Breath Activated 250-50 MCG/ACT

00173069604 Advair Diskus Inhalation Aerosol Powder Breath Activated 250-50 MCG/ACT

00173069700 Advair Diskus Inhalation Aerosol Powder Breath Activated 500-50 MCG/ACT

00173069704 Advair Diskus Inhalation Aerosol Powder Breath Activated 500-50 MCG/ACT

00173071520 Advair HFA Inhalation Aerosol 45-21 MCG/ACT

00173071522 Advair HFA Inhalation Aerosol 45-21 MCG/ACT

00173071620 Advair HFA Inhalation Aerosol 115-21 MCG/ACT



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

00173071622 MCG/ACT	Advair HFA Inhalation Aerosol 115-21	00310620595	Farxiga Oral Tablet 5 MG
00173071720	Advair HFA Inhalation Aerosol 230-21	00310621030	Farxiga Oral Tablet 10 MG
MCG/ACT	Auvan In A Innaiauon Actosol 230-21	00310621095	Farxiga Oral Tablet 10 MG
00173071722 MCG/ACT	Advair HFA Inhalation Aerosol 230-21	00310653001 MG	Bydureon Subcutaneous Pen-injector 2
00173071761 MCG/ACT	Advair HFA Inhalation Aerosol 230-21	00310653004 MG	Bydureon Subcutaneous Pen-injector 2
00173071820 MCG/ACT	Flovent HFA Inhalation Aerosol 44	00310654001 injector 2 MG/0.85M	Bydureon BCise Subcutaneous Auto- AL
00173071920 MCG/ACT	Flovent HFA Inhalation Aerosol 110	00310654004 injector 2 MG/0.85M	Bydureon BCise Subcutaneous Auto- AL
00173072020	Flovent HFA Inhalation Aerosol 220	00456120130	Linzess Oral Capsule 145 MCG
MCG/ACT		00456120230	Linzess Oral Capsule 290 MCG
00186037020 MCG/ACT	Symbicort Inhalation Aerosol 160-4.5	00456120330	Linzess Oral Capsule 72 MCG
00186037028 MCG/ACT	Symbicort Inhalation Aerosol 160-4.5	00456120730 24 Hour 7-10 MG	Namzaric Oral Capsule Extended Release
00186037220 MCG/ACT	Symbicort Inhalation Aerosol 80-4.5	00456121430 24 Hour 14-10 MG	Namzaric Oral Capsule Extended Release
00186037228 MCG/ACT	Symbicort Inhalation Aerosol 80-4.5	00456122130 24 Hour 21-10 MG	Namzaric Oral Capsule Extended Release
00186077660	Brilinta Oral Tablet 60 MG	00456122830 24 Hour 28-10 MG	Namzaric Oral Capsule Extended Release
00186077708	Brilinta Oral Tablet 90 MG	00456122929	Namzaric Oral Capsule ER 24 Hour
00186077739	Brilinta Oral Tablet 90 MG	Therapy Pack 7 & 14	4 & 21 &28 -10 MG
00186077760	Brilinta Oral Tablet 90 MG	00456140211	Bystolic Oral Tablet 2.5 MG
00310008828	Daliresp Oral Tablet 250 MCG	00456140230	Bystolic Oral Tablet 2.5 MG
00310008839	Daliresp Oral Tablet 250 MCG	00456140263	Bystolic Oral Tablet 2.5 MG
00310009530	Daliresp Oral Tablet 500 MCG	00456140511	Bystolic Oral Tablet 5 MG
00310009539	Daliresp Oral Tablet 500 MCG	00456140530	Bystolic Oral Tablet 5 MG
00310009590	Daliresp Oral Tablet 500 MCG	00456140563	Bystolic Oral Tablet 5 MG
00310051260	Calquence Oral Capsule 100 MG	00456140590	Bystolic Oral Tablet 5 MG
00310066812	Lynparza Oral Tablet 100 MG	00456141030	Bystolic Oral Tablet 10 MG
00310066860	Lynparza Oral Tablet 100 MG	00456141090	Bystolic Oral Tablet 10 MG
00310067912	Lynparza Oral Tablet 150 MG	00456142030	Bystolic Oral Tablet 20 MG
00310067960	Lynparza Oral Tablet 150 MG	00456142090	Bystolic Oral Tablet 20 MG
00310067995	Lynparza Oral Tablet 150 MG	00469012599	Xtandi Oral Capsule 40 MG
00310134930	Tagrisso Oral Tablet 40 MG	00469062599	Xtandi Oral Tablet 40 MG
00310135030	Tagrisso Oral Tablet 80 MG	00469072560	Xtandi Oral Tablet 80 MG
00310620530	Farxiga Oral Tablet 5 MG	00469260130 24 Hour 25 MG	Myrbetriq Oral Tablet Extended Release



00469260171 24 Hour 25 MG	Myrbetriq Oral Tablet Extended Release	00597010028 Solution 2.5 MCG/4	Spiriva Respimat Inhalation Aerosol ACT
00469260190 24 Hour 25 MG	Myrbetriq Oral Tablet Extended Release	00597010031 Solution 2.5 MCG/A	Spiriva Respimat Inhalation Aerosol ACT
00469260230 24 Hour 50 MG	Myrbetriq Oral Tablet Extended Release	00597010051 Solution 2.5 MCG/A	Spiriva Respimat Inhalation Aerosol ACT
00469260271 24 Hour 50 MG	Myrbetriq Oral Tablet Extended Release	00597010061 Solution 2.5 MCG/A	Spiriva Respimat Inhalation Aerosol ACT
00469260290 24 Hour 50 MG	Myrbetriq Oral Tablet Extended Release	00597010854	Pradaxa Oral Capsule 110 MG
00469502099 ER 8 MG/ML	Myrbetriq Oral Suspension Reconstituted	00597010860 00597014030	Pradaxa Oral Capsule 110 MG Tradjenta Oral Tablet 5 MG
, 00597015207	Jardiance Oral Tablet 10 MG	00597014061	Tradjenta Oral Tablet 5 MG
00597015230	Jardiance Oral Tablet 10 MG	00597014090	Tradjenta Oral Tablet 5 MG
00597015237	Jardiance Oral Tablet 10 MG	00597014360	Ofev Oral Capsule 100 MG
00597015290	Jardiance Oral Tablet 10 MG	00597014560	Ofev Oral Capsule 150 MG
00597015307	Jardiance Oral Tablet 25 MG	00944265603 Solution Reconstiti	Gammagard S/D Less IgA Intravenous
00597015330	Jardiance Oral Tablet 25 MG	00944265804	Gammagard S/D Less IgA Intravenous
00597015337	Jardiance Oral Tablet 25 MG	Solution Reconstitu	
00597015390	Jardiance Oral Tablet 25 MG	00944270002 GM/10ML	Gammagard Injection Solution 1
00597015531 Solution 2.5-2.5 MC	Stiolto Respimat Inhalation Aerosol CG/ACT	00944270003 GM/25ML	Gammagard Injection Solution 2.5
00597015561 Solution 2.5-2.5 MC	Stiolto Respimat Inhalation Aerosol CG/ACT	00944270004 GM/50ML	Gammagard Injection Solution 5
00597015570 Solution 2.5-2.5 MC	Stiolto Respimat Inhalation Aerosol CG/ACT	00944270005 GM/100ML	Gammagard Injection Solution 10
00597016061 Solution 1.25 MCG/	Spiriva Respimat Inhalation Aerosol /ACT	00944270006 GM/200ML	Gammagard Injection Solution 20
00597035509	Pradaxa Oral Capsule 75 MG	00944270007	Gammagard Injection Solution 30
00597035556	Pradaxa Oral Capsule 75 MG	GM/300ML	dammagara mjecuon boration bo
00597035561	Pradaxa Oral Capsule 75 MG	00944270008 GM/10ML	Gammagard Injection Solution 1
00597036055	Pradaxa Oral Capsule 150 MG	00944270009	Gammagard Injection Solution 2.5
00597036082	Pradaxa Oral Capsule 150 MG	GM/25ML	Gammagaru mjettion Solution 2.5
00597002402 Solution 20-100 M(Combivent Respimat Inhalation Aerosol CG/ACT	00944270010 GM/50ML	Gammagard Injection Solution 5
00597007541 MCG	Spiriva HandiHaler Inhalation Capsule 18	00944270011 GM/100ML	Gammagard Injection Solution 10
00597007547 MCG	Spiriva HandiHaler Inhalation Capsule 18	00944270012 GM/200ML	Gammagard Injection Solution 20
00597007575 MCG	Spiriva HandiHaler Inhalation Capsule 18	00944270013 GM/300ML	Gammagard Injection Solution 30
		00944285001	Cuvitru Subcutaneous Solution 1 GM/5ML



00944285002	Cuvitru Subcutaneous Solution 1 GM/5ML	24510011010 Xtampza ER Oral Capsule ER 12 Hour Abuse-Deterrent 9 MG
00944285003 GM/10ML	Cuvitru Subcutaneous Solution 2	24510011510 Xtampza ER Oral Capsule ER 12 Hour
00944285004 GM/10ML	Cuvitru Subcutaneous Solution 2	Abuse-Deterrent 13.5 MG 24510012010 Xtampza ER Oral Capsule ER 12 Hour
00944285005 GM/20ML	Cuvitru Subcutaneous Solution 4	Abuse-Deterrent 18 MG 24510013010 Xtampza ER Oral Capsule ER 12 Hour
00944285006 GM/20ML	Cuvitru Subcutaneous Solution 4	Abuse-Deterrent 27 MG 24510014010 Xtampza ER Oral Capsule ER 12 Hour
00944285009	Cuvitru Subcutaneous Solution 10	Abuse-Deterrent 36 MG
GM/50ML 00944285010	Cuvitru Subcutaneous Solution 10	25682000101 Soliris Intravenous Solution 300 MG/30ML
GM/50ML		33358022860 Lyrica Oral Capsule 50 MG
15584010101	Atripla Oral Tablet 600-200-300 MG	33358022890 Lyrica Oral Capsule 50 MG
12496120201	Suboxone Sublingual Film 2-0.5 MG	33358022960 Lyrica Oral Capsule 75 MG
12496120203	Suboxone Sublingual Film 2-0.5 MG	33358023060 Lyrica Oral Capsule 100 MG
12496120401	Suboxone Sublingual Film 4-1 MG	33358029530 Premarin Oral Tablet 0.9 MG
12496120403	Suboxone Sublingual Film 4-1 MG	35356001207 Chantix Oral Tablet 1 MG
12496120801	Suboxone Sublingual Film 8-2 MG	35356001214 Chantix Oral Tablet 1 MG
12496120803	Suboxone Sublingual Film 8-2 MG	35356005330 Lyrica Oral Capsule 25 MG
12496121201	Suboxone Sublingual Film 12-3 MG	35356005360 Lyrica Oral Capsule 25 MG
12496121203	Suboxone Sublingual Film 12-3 MG	35356005430 Lyrica Oral Capsule 150 MG
13533080012	Gamunex-C Injection Solution 1 GM/10ML	35356005460 Lyrica Oral Capsule 150 MG
13533080013	Gamunex-C Injection Solution 1 GM/10ML	35356005490 Lyrica Oral Capsule 150 MG
13533080015	Gamunex-C Injection Solution 2.5	35356007003 Truvada Oral Tablet 200-300 MG
GM/25ML	Common C. Inication Colution 25	35356010700 Synthroid Oral Tablet 50 MCG
13533080016 GM/25ML	Gamunex-C Injection Solution 2.5	35356010730 Synthroid Oral Tablet 50 MCG
13533080020	Gamunex-C Injection Solution 5 GM/50ML	35356015701 Flovent HFA Inhalation Aerosol 44 MCG/ACT
13533080021	Gamunex-C Injection Solution 5 GM/50ML	35356016601 Ventolin HFA Inhalation Aerosol Solution
13533080024 GM/200ML	Gamunex-C Injection Solution 20	108 (90 Base) MCG/ACT
13533080025 GM/200ML	Gamunex-C Injection Solution 20	35356016602 Ventolin HFA Inhalation Aerosol Solution 108 (90 Base) MCG/ACT
13533080040	Gamunex-C Injection Solution 40	35356016608 Ventolin HFA Inhalation Aerosol Solution 108 (90 Base) MCG/ACT
GM/400ML	Commence Interview Column 40	35356028460 Prezista Oral Tablet 600 MG
13533080041 GM/400ML	Gamunex-C Injection Solution 40	35356030900 Synthroid Oral Tablet 25 MCG
13533080071	Gamunex-C Injection Solution 10	35356031000 Synthroid Oral Tablet 75 MCG
GM/100ML		35356031030 Synthroid Oral Tablet 75 MCG
13533080072 GM/100ML	Gamunex-C Injection Solution 10	35356031100 Synthroid Oral Tablet 112 MCG

ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

35356031200	Synthroid Oral Tablet 137 MCG	33261070830	Lyrica Oral Capsule 150 MG
35356031300	Synthroid Oral Tablet 175 MCG	33261070860	Lyrica Oral Capsule 150 MG
35356031330	Synthroid Oral Tablet 175 MCG	33261070890	Lyrica Oral Capsule 150 MG
35356031400	Synthroid Oral Tablet 200 MCG	33261071630	Lyrica Oral Capsule 25 MG
35356031500	Synthroid Oral Tablet 300 MCG	33261071660	Lyrica Oral Capsule 25 MG
35356039860	Lyrica Oral Capsule 300 MG	33261071690	Lyrica Oral Capsule 25 MG
35356050060	Amitiza Oral Capsule 24 MCG	33261087301	Advair Diskus Inhalation Aerosol Powder
35356053260	Vimpat Oral Tablet 50 MG	Breath Activated	
33261052102	Lyrica Oral Capsule 50 MG	33261087401 Breath Activated 2	Advair Diskus Inhalation Aerosol Powder 250-50 MCG/ACT
33261052107	Lyrica Oral Capsule 50 MG	33261087501	ProAir HFA Inhalation Aerosol Solution
33261052114	Lyrica Oral Capsule 50 MG	108 (90 Base) MC	
33261052120	Lyrica Oral Capsule 50 MG	33261089301 108 (90 Base) MC	Ventolin HFA Inhalation Aerosol Solution G/ACT
33261052121	Lyrica Oral Capsule 50 MG	33261092001	Ventolin HFA Inhalation Aerosol Solution
33261052128	Lyrica Oral Capsule 50 MG	108 (90 Base) MC	G/ACT
33261052130	Lyrica Oral Capsule 50 MG	42388002326	Cabometyx Oral Tablet 60 MG
33261052160	Lyrica Oral Capsule 50 MG	42388002426	Cabometyx Oral Tablet 20 MG
33261052190	Lyrica Oral Capsule 50 MG	42388002526	Cabometyx Oral Tablet 40 MG
33261052202	Lyrica Oral Capsule 100 MG	43353026330	Lyrica Oral Capsule 50 MG
33261052230	Lyrica Oral Capsule 100 MG	43353026353	Lyrica Oral Capsule 50 MG
33261052260	Lyrica Oral Capsule 100 MG	43353026430	Lyrica Oral Capsule 75 MG
33261052290	Lyrica Oral Capsule 100 MG	43353026446	Lyrica Oral Capsule 75 MG
35356056530	Dexilant Oral Capsule Delayed Release 60	43353026453	Lyrica Oral Capsule 75 MG
MG		43353026470	Lyrica Oral Capsule 75 MG
35356056630 MG	Dexilant Oral Capsule Delayed Release 30	43063017790	Synthroid Oral Tablet 150 MCG
33261069030	Lyrica Oral Capsule 200 MG	43063017890	Synthroid Oral Tablet 125 MCG
33261069060	Lyrica Oral Capsule 200 MG	43353033617	Synthroid Oral Tablet 137 MCG
33261069090	Lyrica Oral Capsule 200 MG	43353033660	Synthroid Oral Tablet 137 MCG
33261069130	Lyrica Oral Capsule 300 MG	43063035402 Abuse-Deterrent	OxyCONTIN Oral Tablet ER 12 Hour
33261069160	Lyrica Oral Capsule 300 MG	43063035410	OxyCONTIN Oral Tablet ER 12 Hour
33261069190	Lyrica Oral Capsule 300 MG	Abuse-Deterrent	
33261070202	Lyrica Oral Capsule 75 MG	43353041330	Lyrica Oral Capsule 100 MG
33261070214	Lyrica Oral Capsule 75 MG	43353041346	Lyrica Oral Capsule 100 MG
33261070230	Lyrica Oral Capsule 75 MG	43353041353	Lyrica Oral Capsule 100 MG
33261070260	Lyrica Oral Capsule 75 MG	43353041370	Lyrica Oral Capsule 100 MG
33261070290	Lyrica Oral Capsule 75 MG	43353041430	Lyrica Oral Capsule 150 MG
		43353041446	Lyrica Oral Capsule 150 MG



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

43353041453	Lyrica Oral	Capsule 150 M	G		44206043940	Privigen	Intravenous	Solution	40
43353041470	Lyrica Oral	Capsule 150 M	G		GM/400ML		_		
43353067553	Lyrica Oral	Capsule 200 M	G		44206043993 GM/400ML	Privigen	Intravenous	Solution	40
43353068760	Premarin C	oral Tablet 0.3 M	IG		44206045101	Hizentra	Subcutaneous	Solution	1
43353068860	Premarin C	oral Tablet 0.625	5 MG		GM/5ML				
43353084030	Lyrica Oral	Capsule 300 M	G		44206045190 GM/5ML	Hizentra	Subcutaneous	Solution	1
43353084053	Lyrica Oral	Capsule 300 M	G		44206045202	Hizentra	Subcutaneous	Solution	2
43353085403	Colcrys Ora	al Tablet 0.6 MG			GM/10ML				
43353085409	Colcrys Ora	al Tablet 0.6 MG			44206045291 GM/10ML	Hizentra	Subcutaneous	Solution	2
43353087653	Lyrica Oral	Capsule 225 M	G		44206045404	Hizentra	Subcutaneous	Solution	4
43353089905	Chantix Co	ntinuing Month	Pak Oral Ta	blet	GM/20ML				-
1 MG					44206045492 GM/20ML	Hizentra	Subcutaneous	Solution	4
44087002203 Syringe 22 MCG/0.5		cutaneous Sol	ution Prefi	lled	44206045510	Hizentra	Subcutaneous	Solution	10
44087002209		cutaneous Sol	ution Prefi	lled	GM/50ML	IIIZeilti a	Subcutaneous	Solution	10
Syringe 22 MCG/0.5					44206045593	Hizentra	Subcutaneous	Solution	10
44087004403 Syringe 44 MCG/0.5		cutaneous Sol	ution Prefi	lled	GM/50ML				
44087004409	Rebif Sub	cutaneous Sol	ution Prefi	lled	44206045621 Syringe 1 GM/5ML	Hizentra S	ubcutaneous So	lution Pref	illed
Syringe 44 MCG/0.5	ML				44206045694	Hizentra S	ubcutaneous So	lution Pref	illed
44087018801 Subcutaneous Soluti				Pack	Syringe 1 GM/5ML				
44087332201		idose Subcutar		tion	44206045722 Syringe 2 GM/10ML		ubcutaneous So	lution Pref	illed
Auto-injector 22 MC					44206045795	Hizentra S	ubcutaneous So	lution Pref	illed
44087332209		idose Subcutar	neous Solu	tion	Syringe 2 GM/10ML				
Auto-injector 22 MC		idaaa Cubauta	come Colu	+:	44206045824 Syringe 4 GM/20ML		ubcutaneous So	lution Pref	illed
44087334401 Auto-injector 44 MC		idose Subcutai	ieous soiu	uon	44206045896		ubcutaneous So	lution Drof	illad
44087334409	Rebif Reb	idose Subcutai	neous Solut	tion	Syringe 4 GM/20ML		ubcutaneous 30		illeu
Auto-injector 44 MC	G/0.5ML				49230064551	Velphoro (Oral Tablet Chew	able 500 M	G
44087882201 Solution Prefilled Sys		ration Pack & 6X22 MCG	Subcutane	eous	47783064401 MG/2ML	Takhzyro	Subcutaneous	Solution	300
44206043605	Privigen In	travenous Solut	ion 5 GM/50	ML	49502019580	Semglee	Subcutaneous	Solution	100
44206043690	Privigen In	travenous Solut	ion 5 GM/50	ML	UNIT/ML	-			
44206043710 GM/100ML	Privigen	Intravenous	Solution	10	49502019671 injector 100 UNIT/M	0	Subcutaneous	Solution 1	Pen-
44206043791 GM/100ML	Privigen	Intravenous	Solution	10	49502019675 injector 100 UNIT/M	0	Subcutaneous	Solution 1	Pen-
44206043820	Privigen	Intravenous	Solution	20	49702022613	Tivicay Ora	al Tablet 10 MG		
GM/200ML					49702022713	Tivicay Ora	al Tablet 25 MG		
44206043892 GM/200ML	Privigen	Intravenous	Solution	20	49702022813	Tivicay Ora	al Tablet 50 MG		



49702023113	Triumeq Oral Tablet 600-50-300 MG	50242004062 Reconstituted 150 M	Xolair	Subcutaneous	Solution
50090103600	Januvia Oral Tablet 100 MG			Subautanaaya	Colution
50090103602	Januvia Oral Tablet 100 MG	50242004086 Reconstituted 150 N	Xolair MG	Subcutaneous	Solution
49702024213	Juluca Oral Tablet 50-25 MG	50090185303	Premarir	n Oral Tablet 0.3 MG	
49702025537	Tivicay PD Oral Tablet Soluble 5 MG	50090219300		SoloStar Subcutaneou	s Solution
50090108500	Isentress Oral Tablet 400 MG	Pen-injector 300 UN	IIT/ML		
50090108501	Isentress Oral Tablet 400 MG	50090227200 Subcutaneous Susp	NovoLOC ension Pen	G Mix 70/30 -injector (70-30) 100 l	FlexPen JNIT/ML
50090108502	Isentress Oral Tablet 400 MG	50090227900	Genvoya	Oral Tablet 150-150-2	00-10 MG
50090112700	Bystolic Oral Tablet 5 MG	50090234000	Odefsey (Oral Tablet 200-25-25	MG
50090112701	Bystolic Oral Tablet 5 MG	50242012101	Esbriet O	ral Capsule 267 MG	
50090115800 108 (90 Base) MCG	Ventolin HFA Inhalation Aerosol Solution /ACT	50242012206		ral Tablet 267 MG	
50090115900	Ventolin HFA Inhalation Aerosol Solution	50242012301	Esbriet O	oral Tablet 801 MG	
108 (90 Base) MCG		50090244500	Xifaxan C	Oral Tablet 200 MG	
50090122901	Lyrica Oral Capsule 50 MG	50242021401 Syringe 75 MG/0.5M		ubcutaneous Solution	Prefilled
50090124200	Restasis Ophthalmic Emulsion 0.05 %	50242021501		ubcutaneous Solution	Drofilled
50090127600 UNIT/ML	Levemir Subcutaneous Solution 100	Syringe 150 MG/MI		ubcutaneous solution	rrenneu
50090130700	Bystolic Oral Tablet 10 MG	50242021586 Syringe 150 MG/MI		ubcutaneous Solution	Prefilled
50090130701	Bystolic Oral Tablet 10 MG	49999039300	Synthroi	d Oral Tablet 150 MCG	
50090132700	Prezista Oral Tablet 800 MG	49999039330	Synthroi	d Oral Tablet 150 MCG	
50090132900 108 (90 Base) MCG	ProAir HFA Inhalation Aerosol Solution /ACT	50436126501	Lyrica Or	al Capsule 50 MG	
50090137500	HumaLOG Injection Solution 100	50436126502	Lyrica Or	al Capsule 50 MG	
UNIT/ML		50436126503	Lyrica Or	al Capsule 50 MG	
50090139800 Pen-injector 100 Ul	Lantus SoloStar Subcutaneous Solution NIT/ML	50436605000 108 (90 Base) MCG,		HFA Inhalation Aeros	ol Solution
50090140300 MCG/ACT	Symbicort Inhalation Aerosol 160-4.5	50436652301	Lyrica Or	al Capsule 75 MG	
50090143600	Eliquis Oral Tablet 2.5 MG	50436652302	Lyrica Or	al Capsule 75 MG	
50090143700	Eliquis Oral Tablet 5 MG	50436652303	Lyrica Or	al Capsule 75 MG	
50090147500	Levemir FlexTouch Subcutaneous	50436652402	Lyrica Or	al Capsule 300 MG	
Solution Pen-inject		50436652403	Lyrica Or	al Capsule 300 MG	
50090160600	Triumeq Oral Tablet 600-50-300 MG	50436652501	Lyrica Or	al Capsule 25 MG	
50090166300	HumaLOG KwikPen Subcutaneous	50436652503	Lyrica Or	al Capsule 25 MG	
Solution Pen-inject		50436652603	Lyrica Or	al Capsule 100 MG	
50090166400	NovoLOG Injection Solution 100 UNIT/ML	49999082400	Synthroi	d Oral Tablet 88 MCG	
50090167800 Pen-injector 100 Ul	NovoLOG FlexPen Subcutaneous Solution NIT/ML	50436652701	Lyrica Or	al Capsule 150 MG	
		50436652702	Lyrica Or	al Capsule 150 MG	



49999082500	Synthroid Oral Tablet 100 MCG	50458030901 Suspension Reconst	RisperDAL ituted ER 12.	Consta 5 MG	Intramuscular
50436652703	Lyrica Oral Capsule 150 MG	50458030911			Intramuscular
50436652801	Lyrica Oral Capsule 200 MG	Suspension Reconst	RisperDAL ituted ER 12.	Consta 5 MG	Inclanuscular
49999082530	Synthroid Oral Tablet 100 MCG	50458056001	Invega	Sustenna	Intramuscular
50436652803	Lyrica Oral Capsule 200 MG	Suspension Prefilled			
49999089530	Lyrica Oral Capsule 75 MG	50458056101 Suspension Prefilled	Invega l Syringe 78 l	Sustenna MG/0.5ML	Intramuscular
49999089560	Lyrica Oral Capsule 75 MG	50458056201	Invega	Sustenna	Intramuscular
49999089590	Lyrica Oral Capsule 75 MG	Suspension Prefilled	d Syringe 117	MG/0.75ML	
49999090530	Lyrica Oral Capsule 100 MG	50458056301 Suspension Prefilled	Invega I Svringe 156	Sustenna MG/ML	Intramuscular
49999090560	Lyrica Oral Capsule 100 MG	50458056401	Invega	Sustenna	Intramuscular
49999090590	Lyrica Oral Capsule 100 MG	Suspension Prefilled			ind annaboundi
49999090630	Lyrica Oral Capsule 200 MG	50458057701	Xarelto Ora	Tablet 2.5 MG	
49999090660	Lyrica Oral Capsule 200 MG	50458057710	Xarelto Ora	Tablet 2.5 MG	
49999090885	ProAir HFA Inhalation Aerosol Solution	50458057718	Xarelto Ora	Tablet 2.5 MG	
108 (90 Base) MCG		50458057760	Xarelto Ora	Tablet 2.5 MG	
50090285300 injector 18 MG/3MI	Victoza Subcutaneous Solution Pen-	50458057810	Xarelto Ora	Tablet 15 MG	
49999094930	Lyrica Oral Capsule 50 MG	50458057830	Xarelto Ora	l Tablet 15 MG	
49999094960	Lyrica Oral Capsule 50 MG	50458057890	Xarelto Ora	l Tablet 15 MG	
49999094990	Lyrica Oral Capsule 50 MG	50458057910	Xarelto Ora	l Tablet 20 MG	
49999095300	Synthroid Oral Tablet 125 MCG	50458057930	Xarelto Ora	l Tablet 20 MG	
49999095330	Synthroid Oral Tablet 125 MCG	50458057989	Xarelto Ora	l Tablet 20 MG	
49999095430	Synthroid Oral Tablet 100 MCG	50458057990	Xarelto Ora	Tablet 20 MG	
50458014030	Invokana Oral Tablet 100 MG	50458058010	Xarelto Ora	Tablet 10 MG	
50458014090	Invokana Oral Tablet 100 MG	50458058030	Xarelto Ora	Tablet 10 MG	
50458014130	Invokana Oral Tablet 300 MG	50458058090	Xarelto Ora	Tablet 10 MG	
50458014190	Invokana Oral Tablet 300 MG	50458058451 Pack 15 & 20 MG	Xarelto Star	ter Pack Oral 7	Cablet Therapy
50458030601 Suspension Reconst	RisperDAL Consta Intramuscular	50458060601	Invega Trir	za Intramuscul	ar Suspension
-		Prefilled Syringe 27	3 MG/0.88M		-
50458030611 Suspension Reconst	RisperDAL Consta Intramuscular cituted ER 25 MG	50458060701 Prefilled Syringe 41		iza Intramuscul	ar Suspension
50458030701 Suspension Reconst	RisperDAL Consta Intramuscular cituted ER 37.5 MG	50458060801	-	za Intramuscul	ar Suspension
50458030711	RisperDAL Consta Intramuscular	Prefilled Syringe 54	6 MG/1.75M	-	
Suspension Reconst	•	50458060901 Prefilled Syringe 81		iza Intramuscul L	ar Suspension
50458030801 Suspension Reconst	RisperDAL Consta Intramuscular cituted ER 50 MG	50474070062	Cimzia Subo	cutaneous Kit 2	X 200 MG
50458030811 Suspension Reconst	RisperDAL Consta Intramuscular	50474071079 Syringe Kit 2 X 200		filled Subcutan	eous Prefilled



0						
	50474071081 Syringe Kit 6 X 200 I	Cimzia Starter Kit Subcutaneous Prefilled MG/ML	50090093400 MCG/ACT	Flovent HFA Inhalation Aerosol 220		
	50484001030	Santyl External Ointment 250 UNIT/GM	50090098000	Atripla Oral Tablet 600-200-300 MG		
	50484001090	Santyl External Ointment 250 UNIT/GM	50090406800 Pen-injector 100 UN	Lantus SoloStar Subcutaneous Solution IIT/ML		
	50090016705	Premarin Oral Tablet 0.625 MG	50090099500	Chantix Continuing Month Pak Oral Tablet		
	50090040300 (70-30) 100 UNIT/N	NovoLIN 70/30 Subcutaneous Suspension ML	1 MG	Chantix Continuing Month Pak Oral Tablet		
	50090332600	Bystolic Oral Tablet 20 MG	50090099800 MG X 11 & 1 MG X 4	Chantix Starting Month Pak Oral Tablet 0.5 2		
	50090073000 Breath Activated 10	Advair Diskus Inhalation Aerosol Powder 0-50 MCG/ACT	50090408400	Januvia Oral Tablet 100 MG		
	50090073100 Breath Activated 25	Advair Diskus Inhalation Aerosol Powder 0-50 MCG/ACT	50090408500 Subcutaneous Suspe	NovoLOG Mix 70/30 FlexPen ension Pen-injector (70-30) 100 UNIT/ML		
	50090073200	Advair Diskus Inhalation Aerosol Powder	50090408600	Januvia Oral Tablet 50 MG		
	Breath Activated 50		50090408700	Januvia Oral Tablet 25 MG		
	50090347201	Januvia Oral Tablet 50 MG	50090417700 Solution Pen-injecto	Toujeo Max SoloStar Subcutaneous or 300 UNIT/ML		
	50090348100	Farxiga Oral Tablet 10 MG	50090424800	Spiriva HandiHaler Inhalation Capsule 18		
	50090348200	Farxiga Oral Tablet 5 MG	MCG			
	50090348300 injector 1.5 MG/0.51	Trulicity Subcutaneous Solution Pen- ML	50090448800 UNIT/ML	HumaLOG Injection Solution 100		
	50090348400 injector 0.75 MG/0.5	Trulicity Subcutaneous Solution Pen- 5ML	50090450100 Solution Pen-injecto	Levemir FlexTouch Subcutaneous or 100 UNIT/ML		
	50090349100 Pen-injector 200 UN	Tresiba FlexTouch Subcutaneous Solution IIT/ML	50090550300	Janumet Oral Tablet 50-1000 MG		
	50090363900	Xarelto Oral Tablet 20 MG	50090550400Janumet XR Oral Tablet Extended Release24 Hour 50-1000 MG			
	50090364000 MCG/ACT	Symbicort Inhalation Aerosol 160-4.5	50090551700	Januvia Oral Tablet 50 MG		
	50881000560	Jakafi Oral Tablet 5 MG	50090554700	Januvia Oral Tablet 25 MG		
	50881001060	Jakafi Oral Tablet 10 MG	50090558500	Januvia Oral Tablet 100 MG		
	50881001560	Jakafi Oral Tablet 15 MG	50090558501	Januvia Oral Tablet 100 MG		
	50881002060	Jakafi Oral Tablet 20 MG	50090560400	APO-Varenicline Oral Tablet 1 MG		
	50881002560	Jakafi Oral Tablet 25 MG	50090560500	APO-Varenicline Oral Tablet 0.5 MG		
	50090087000	Truvada Oral Tablet 200-300 MG	50090561800	Janumet Oral Tablet 50-500 MG		
	50090087002	Truvada Oral Tablet 200-300 MG	50419025001	Adempas Oral Tablet 0.5 MG		
	50090087003	Truvada Oral Tablet 200-300 MG	50419025003	Adempas Oral Tablet 0.5 MG		
	50090087600	Lantus Subcutaneous Solution 100	50419025091	Adempas Oral Tablet 0.5 MG		
	UNIT/ML		50419025101	Adempas Oral Tablet 1 MG		
	50090091000 MCG/ACT	Flovent HFA Inhalation Aerosol 110	50419025103	Adempas Oral Tablet 1 MG		
	50090091600	Flovent HFA Inhalation Aerosol 44	50419025191	Adempas Oral Tablet 1 MG		
	MCG/ACT		50419025201	Adempas Oral Tablet 1.5 MG		
			50419025203	Adempas Oral Tablet 1.5 MG		



50419025291	Adempas Oral Tablet 1.5 MG	52959089102	Lyrica Oral Capsule 50 MG			
50419025301	Adempas Oral Tablet 2 MG	52959089130	Lyrica Oral Capsule 50 MG			
50419025303	Adempas Oral Tablet 2 MG	52959089160	Lyrica Oral Capsule 50 MG			
50419025391	Adempas Oral Tablet 2 MG	52959089190	Lyrica Oral Capsule 50 MG			
50419025401	Adempas Oral Tablet 2.5 MG	52959089730	Lyrica Oral Capsule 150 MG			
50419025403	Adempas Oral Tablet 2.5 MG	52959089760	Lyrica Oral Capsule 150 MG			
50419025491	Adempas Oral Tablet 2.5 MG	52959089790	Lyrica Oral Capsule 150 MG			
50419052401	Betaseron Subcutaneous Kit 0.3 MG	54569385400	Santyl External Ointment 250 UNIT/GM			
50419052435	Betaseron Subcutaneous Kit 0.3 MG	52959095156	Chantix Continuing Month Pak Oral Tablet			
51167010602 37.5 & 75 MG	Trikafta Oral Tablet Therapy Pack 50-25-	1 MG 52959096903	Truvada Oral Tablet 200-300 MG			
51167033101 75 & 150 MG	Trikafta Oral Tablet Therapy Pack 100-50-	52959097801 108 (90 Base) MCC	ProAir HFA Inhalation Aerosol Solution G/ACT			
52937000120	Vascepa Oral Capsule 1 GM	54092060601	Xiidra Ophthalmic Solution 5 %			
52937000340	Vascepa Oral Capsule 0.5 GM	54092060606	Xiidra Ophthalmic Solution 5 %			
52959014860 Abuse-Deterrent 20	OxyCONTIN Oral Tablet ER 12 Hour) MG	54569524100 Breath Activated 1	Advair Diskus Inhalation Aerosol Powder 00-50 MCG/ACT			
52959020600	52959020600Synthroid Oral Tablet 150 MCG52959022200Premarin Oral Tablet 1.25 MG52959022300Premarin Oral Tablet 0.625 MG		Advair Diskus Inhalation Aerosol Powder			
52959022200			50-50 MCG/ACT			
52959022300			Advair Diskus Inhalation Aerosol Powder 00-50 MCG/ACT			
52959022330	Premarin Oral Tablet 0.625 MG	55700014730	Suboxone Sublingual Film 8-2 MG			
53002155001 108 (90 Base) MCG	ProAir HFA Inhalation Aerosol Solution /ACT	54569558800	Truvada Oral Tablet 200-300 MG			
52959039660	OxyCONTIN Oral Tablet ER 12 Hour	54569558802	Truvada Oral Tablet 200-300 MG			
Abuse-Deterrent 4	D MG	54569558803	Truvada Oral Tablet 200-300 MG			
52959056901 108 (90 Base) MCG	Proventil HFA Inhalation Aerosol Solution /ACT	54569560500 UNIT/ML	Lantus Subcutaneous Solution 100			
52959074630	Lyrica Oral Capsule 100 MG	54569566300	Flovent HFA Inhalation Aerosol 110			
52959074660	Lyrica Oral Capsule 100 MG	MCG/ACT	Element HEA Telefor Accord 44			
52959074690	Lyrica Oral Capsule 100 MG	54569567100 MCG/ACT	Flovent HFA Inhalation Aerosol 44			
52959074701	Lyrica Oral Capsule 75 MG	54569570200	Flovent HFA Inhalation Aerosol 220			
52959074730	Lyrica Oral Capsule 75 MG	MCG/ACT				
52959074760	Lyrica Oral Capsule 75 MG	54569580500	Atripla Oral Tablet 600-200-300 MG			
52959074790	Lyrica Oral Capsule 75 MG	54569582500	Lyrica Oral Capsule 75 MG			
54569291800 (70-30) 100 UNIT/	NovoLIN 70/30 Subcutaneous Suspension ML	54569582501 54569582502	Lyrica Oral Capsule 75 MG Lyrica Oral Capsule 75 MG			
54569336901	Synthroid Oral Tablet 125 MCG	54569583000	Chantix Continuing Month Pak Oral Tablet			
54569346700 Suspension (70-30	HumuLIN 70/30 Subcutaneous) 100 UNIT/ML	1 MG				

ΞΔ

ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

54569583200	Chantix Starting Month Pak Oral Tablet 0.5	54569091002	Synthroid Oral Tablet 150 MCG
MG X 11 & 1 MG X		54569631900	Combigan Ophthalmic Solution 0.2-0.5 $\%$
55700048830	Lyrica Oral Capsule 225 MG	54569633200	Alphagan P Ophthalmic Solution 0.1 %
55154961800	Brilinta Oral Tablet 90 MG	54569633500	Lumigan Ophthalmic Solution 0.01 %
55154961808	Brilinta Oral Tablet 90 MG	54569633601	Lyrica Oral Capsule 150 MG
54569592500	Januvia Oral Tablet 100 MG	54569634200	Bystolic Oral Tablet 10 MG
55700055730 Abuse-Deterrent 1	Xtampza ER Oral Capsule ER 12 Hour 3.5 MG	54569634201	Bystolic Oral Tablet 10 MG
54569603400	Isentress Oral Tablet 400 MG	54569636600	Prezista Oral Tablet 800 MG
54569603401	Isentress Oral Tablet 400 MG	54569636800	Azopt Ophthalmic Suspension 1 %
54569603402	Isentress Oral Tablet 400 MG	54569637000 108 (90 Base) MCC	ProAir HFA Inhalation Aerosol Solution
54569608600	Prezista Oral Tablet 600 MG	54569639900	Suboxone Sublingual Film 8-2 MG
55289012930	Synthroid Oral Tablet 100 MCG	54569640300	Prezista Oral Suspension 100 MG/ML
54569611900	Bystolic Oral Tablet 5 MG	54569640600	Combivent Respinat Inhalation Aerosol
54569616600 108 (90 Base) MC(Ventolin HFA Inhalation Aerosol Solution	Solution 20-100 M	1
54569616700	Ventolin HFA Inhalation Aerosol Solution	54569641900	Tivicay Oral Tablet 50 MG
108 (90 Base) MC		54569641901	Tivicay Oral Tablet 50 MG
54569623900	Lyrica Oral Capsule 50 MG	54569646200 Pen-injector 100 U	Lantus SoloStar Subcutaneous Solution NIT/ML
54569623901	Lyrica Oral Capsule 50 MG	54569646201	Lantus SoloStar Subcutaneous Solution
54569623902	Lyrica Oral Capsule 50 MG	Pen-injector 100 U	NIT/ML
54569624000	Lyrica Oral Capsule 100 MG	54569646600 MCG/ACT	Symbicort Inhalation Aerosol 160-4.5
54569624001	Lyrica Oral Capsule 100 MG	54569650700	Victoza Subcutaneous Solution Pen-
55289021430	Lyrica Oral Capsule 150 MG	injector 18 MG/3M	
54569624002	Lyrica Oral Capsule 100 MG	54569651300	Eliquis Oral Tablet 2.5 MG
54569625600	Restasis Ophthalmic Emulsion 0.05 %	54569651400	Eliquis Oral Tablet 5 MG
54569627600	Pradaxa Oral Capsule 150 MG	54569656900	Triumeq Oral Tablet 600-50-300 MG
55289025530	Lyrica Oral Capsule 300 MG	54569657000	Levemir FlexTouch Subcutaneous
55289025730	Lyrica Oral Capsule 100 MG	Solution Pen-inject	
54569081103	Premarin Oral Tablet 0.3 MG	54569658400	NovoLOG Injection Solution 100 UNIT/ML
54569081200	Premarin Oral Tablet 0.625 MG	54569658500 Solution Pen-inject	HumaLOG KwikPen Subcutaneous or 100 UNIT/ML
54569081205	Premarin Oral Tablet 0.625 MG	54569658700	NovoLOG FlexPen Subcutaneous Solution
54569081301	Premarin Oral Tablet 1.25 MG	Pen-injector 100 U	NIT/ML
54569630000 UNIT/ML	Levemir Subcutaneous Solution 100	54569659400	Prezcobix Oral Tablet 800-150 MG
54569090701	Synthroid Oral Tablet 75 MCG	54569662500 Pen-injector 300 U	Toujeo SoloStar Subcutaneous Solution NIT/ML
54569090802	Synthroid Oral Tablet 50 MCG	54569663100	NovoLOG Mix 70/30 FlexPen
54569090900	Synthroid Oral Tablet 100 MCG	Subcutaneous Susp	oension Pen-injector (70-30) 100 UNIT/ML

3/

54569663300	Genvoya Oral Tablet 150-150-200-10 MG	58406005504 MG/0.5ML	Enbrel	Subcutaneous Solu	tion	25
54569664500	Odefsey Oral Tablet 200-25-25 MG	58406042534	Enbrel	Subcutaneous	Solı	ution
54569666500 Breath Activated 200	Breo Ellipta Inhalation Aerosol Powder D-25 MCG/INH	Reconstituted 25 MC	ř			
54569667200	Xifaxan Oral Tablet 200 MG	58406042541 Reconstituted 25 MC	Enbrel	Subcutaneous	Solı	ution
54569677000	Bystolic Oral Tablet 20 MG	58406043501	Enbrel	Subcutaneous Solution	Pre	filled
55289056915	Lyrica Oral Capsule 75 MG	Syringe 50 MG/ML	Park and		Dur	C11 - J
55289056930	Lyrica Oral Capsule 75 MG	58406043504 Syringe 50 MG/ML	Enbrei	Subcutaneous Solution	Prei	niiea
55289056960	Lyrica Oral Capsule 75 MG	58406044501		SureClick Subcutaneous	s Solı	ution
57962001428	Imbruvica Oral Tablet 140 MG	Auto-injector 50 MG				
57962007028	Imbruvica Oral Capsule 70 MG	58406044504 Auto-injector 50 MG		SureClick Subcutaneous	; Solı	ution
57962014009	Imbruvica Oral Capsule 140 MG	58406045501		Subcutaneous Solution	Pre	filled
57962014012	Imbruvica Oral Capsule 140 MG	Syringe 25 MG/0.5M	L			
57962028028	Imbruvica Oral Tablet 280 MG	58406045504 Syringe 25 MG/0.5M		Subcutaneous Solution	Prei	filled
57962042028	Imbruvica Oral Tablet 420 MG	58468013001	Renvela	a Oral Tablet 800 MG		
57962056028	Imbruvica Oral Tablet 560 MG	58468013002	Renvela	a Oral Tablet 800 MG		
54569870400	Lyrica Oral Capsule 50 MG	58468013101	Renvela	a Oral Packet 2.4 GM		
54569870401	Lyrica Oral Capsule 50 MG	58468013102	Renvela	a Oral Packet 2.4 GM		
54569870500	Lyrica Oral Capsule 100 MG	58468013201	Renvela	a Oral Packet 0.8 GM		
54569870700	Lyrica Oral Capsule 150 MG	58468013202	Renvela	a Oral Packet 0.8 GM		
54569870800	Lyrica Oral Capsule 75 MG	58468021001	Aubagi	o Oral Tablet 14 MG		
58118991708 108 (90 Base) MCG/A	ProAir HFA Inhalation Aerosol Solution ACT	58468021002	Aubagi	o Oral Tablet 14 MG		
58118999205	Chantix Starting Month Pak Oral Tablet 0.5	58468021004	Aubagi	o Oral Tablet 14 MG		
MG X 11 & 1 MG X 42		58468021101	Aubagi	o Oral Tablet 7 MG		
58406001001 Syringe 25 MG/0.5M	Enbrel Subcutaneous Solution Prefilled L	58468021102	Aubagi	o Oral Tablet 7 MG		
	Enbrel Subcutaneous Solution Prefilled	58468021104	Aubagi	o Oral Tablet 7 MG		
Syringe 25 MG/0.5M		55289096930	Lyrica (Oral Capsule 50 MG		
58406002101 Syringe 50 MG/ML	Enbrel Subcutaneous Solution Prefilled	59572040200	Revlimi	id Oral Capsule 2.5 MG		
58406002104	Enbrel Subcutaneous Solution Prefilled	59572040228	Revlimi	id Oral Capsule 2.5 MG		
Syringe 50 MG/ML		59572040500	Revlim	id Oral Capsule 5 MG		
58406003201 Auto-injector 50 MG,	Enbrel SureClick Subcutaneous Solution /ML	59572040528	Revlimi	id Oral Capsule 5 MG		
58406003204	Enbrel SureClick Subcutaneous Solution	59572041000		id Oral Capsule 10 MG		
Auto-injector 50 MG	/ML	59572041028		id Oral Capsule 10 MG		
58406005501 MG/0.5ML	Enbrel Subcutaneous Solution 25	59572041500	Revlimi	id Oral Capsule 15 MG		
		59572041521	Revlimi	id Oral Capsule 15 MG		



59572042000

Revlimid Oral Capsule 20 MG

59572042021	Revlimid Oral Capsule 20 MG	55513013728	Otezla Ora	ll Tablet 30 M	1G	
59572042500	Revlimid Oral Capsule 25 MG	55513013760	Otezla Ora	l Tablet 30 M	1G	
59572042521	Revlimid Oral Capsule 25 MG	55513014401	Epogen	Injection	Solution	10000
59572050100	Pomalyst Oral Capsule 1 MG	UNIT/ML				
59572050121	Pomalyst Oral Capsule 1 MG	55513014410 UNIT/ML	Epogen	Injection	Solution	10000
59572050200	Pomalyst Oral Capsule 2 MG	55513014801	Epogen In	jection Solut	ion 4000 UN	IIT/ML
59572050221	Pomalyst Oral Capsule 2 MG	55513014810	Epogen In	jection Solut	ion 4000 UN	IIT/ML
59572050300	Pomalyst Oral Capsule 3 MG	55513026701	Epogen In	jection Solut	ion 3000 UN	IIT/ML
59572050321	Pomalyst Oral Capsule 3 MG	55513026710	Epogen In	jection Solut	ion 3000 UN	IIT/ML
59572050400	Pomalyst Oral Capsule 4 MG	55513028301	Epogen	Injection	Solution	10000
59572050421	Pomalyst Oral Capsule 4 MG	UNIT/ML				
59572063106	Otezla Oral Tablet 30 MG	55513028310 UNIT/ML	Epogen	Injection	Solution	10000
59572063255 30 MG	Otezla Oral Tablet Therapy Pack 10 & 20 &	55513036955 30 MG	Otezla Ora	l Tablet Ther	apy Pack 10	& 20 &
55466010411	Levo-T Oral Tablet 25 MCG	55513047801	Epogen	Injection	Solution	20000
55466010419	Levo-T Oral Tablet 25 MCG	UNIT/ML				
55466010511	Levo-T Oral Tablet 50 MCG	55513047810 UNIT/ML	Epogen	Injection	Solution	20000
55466010519	Levo-T Oral Tablet 50 MCG	55513071001	Prolia Su	bcutaneous	Solution F	refilled
55466010611	Levo-T Oral Tablet 75 MCG	Syringe 60 MG/ML				
55466010619	Levo-T Oral Tablet 75 MCG	55513076001 Auto-injector 140 M	•	ureClick Sub	cutaneous S	Solution
55466010711	Levo-T Oral Tablet 88 MCG	55513076002		ureClick Sub	cutaneous S	Colution
55466010811	Levo-T Oral Tablet 100 MCG	55513076002 Repatha SureClick Subcutaneous Solution Auto-injector 140 MG/ML				biution
59627022205 Syringe Kit 30 MCG/	Avonex Prefilled Intramuscular Prefilled (0.5ML	55513084101 injector 70 MG/ML	Aimovig	Subcutaneou	s Solution	Auto-
59627033304 Kit 30 MCG/0.5ML	Avonex Pen Intramuscular Auto-injector	55513084102 Solution Auto-inject	-	(140 MG Do 4L	ose) Subcut	taneous
55466010819	Levo-T Oral Tablet 100 MCG	55513084300	0	Subcutaneou	s Solution	Auto-
55466010911	Levo-T Oral Tablet 112 MCG	injector 140 MG/ML 55513084301		Subcutaneou	c Colution	Auto
55466011011	Levo-T Oral Tablet 125 MCG	injector 140 MG/ML		Subcutaneot	15 501011011	Auto-
55466011019	Levo-T Oral Tablet 125 MCG	59676030200	Procrit Inj	ection Soluti	on 2000 UN	IT/ML
55466011111	Levo-T Oral Tablet 137 MCG	59676030201	Procrit Inj	ection Soluti	on 2000 UN	IT/ML
55466011211	Levo-T Oral Tablet 150 MCG	59676030300	Procrit Inj	ection Soluti	on 3000 UN	IT/ML
55466011311	Levo-T Oral Tablet 175 MCG	59676030301	Procrit Inj	ection Soluti	on 3000 UN	IT/ML
55466011411	Levo-T Oral Tablet 200 MCG	59676030400	Procrit Inj	ection Soluti	on 4000 UN	IT/ML
55466011511	Levo-T Oral Tablet 300 MCG	59676030401	Procrit Inj	ection Soluti	on 4000 UN	IT/ML
55513012601	Epogen Injection Solution 2000 UNIT/ML	59676031000	Procrit Inj	ection Soluti	on 10000 UI	NIT/ML
55513012610	Epogen Injection Solution 2000 UNIT/ML	59676031001	Procrit Inj	ection Soluti	on 10000 UI	NIT/ML



5967	6031002	Procrit Injection Solution 10000 UNIT/ML	61874017008 MG	Vraylar Oral C	Capsule	e Therap	oy Pa	ck 1	.5 & 3
5967	6031200	Procrit Injection Solution 10000 UNIT/ML		Sumthroid Ora	JTable	-+ 75 M(TC .		
5967	6031204	Procrit Injection Solution 10000 UNIT/ML	58864048730	Synthroid Ora				0.00	
5967	6032000	Procrit Injection Solution 20000 UNIT/ML	59922063101	Auryxia Oral				G(Fe	e)
5967	6032004	Procrit Injection Solution 20000 UNIT/ML	58864072230	Synthroid Ora	al Table	et 50 M(CG		
5967	6034000	Procrit Injection Solution 40000 UNIT/ML	58864073001	Synthroid Ora	al Table	et 100 M	1CG		
5967	6034001	Procrit Injection Solution 40000 UNIT/ML	58864073030	Synthroid Ora	al Table	et 100 M	1CG		
5967	6056201	Prezista Oral Tablet 600 MG	58864077930	Synthroid Ora	al Table	et 125 M	1CG		
	6056301	Prezista Oral Tablet 75 MG	61919050330	Lyrica Oral Ca	apsule !	50 MG			
	6056401	Prezista Oral Tablet 150 MG	61919050360	Lyrica Oral Ca	psule !	50 MG			
			61919050390	Lyrica Oral Ca	apsule !	50 MG			
	6056501	Prezista Oral Suspension 100 MG/ML	61919050430	Lyrica Oral Ca	apsule ?	75 MG			
	6056630	Prezista Oral Tablet 800 MG	61919050460	Lyrica Oral Ca	apsule ?	75 MG			
5967	6057530	Prezcobix Oral Tablet 800-150 MG	61919050490	Lyrica Oral Ca	apsule '	75 MG			
5967	6060012	Erleada Oral Tablet 60 MG	61919050530	Lyrica Oral Ca	-				
5967	6080030	Symtuza Oral Tablet 800-150-200-10 MG	61919050560	Lyrica Oral Ca	-				
5973	0650201	Bivigam Intravenous Solution 5 GM/50ML	61919050590	Lyrica Oral Ca	-				
	4005427	Stelara Intravenous Solution 130			-				
MG/2			61919050690	Lyrica Oral Ca	-			10	
5789 MG/0	4006002).5ML	Stelara Subcutaneous Solution 45	59011041010 Abuse-Deterrent 10	OxyCONTIN MG	Oral '	Tablet	ER	12	Hour
	4006003 ge 45 MG/0.5M	Stelara Subcutaneous Solution Prefilled L	59011041020 Abuse-Deterrent 10	OxyCONTIN MG	Oral '	Tablet	ER	12	Hour
	4006103 ge 90 MG/ML	Stelara Subcutaneous Solution Prefilled	59011041510 Abuse-Deterrent 15	OxyCONTIN MG	Oral '	Tablet	ER	12	Hour
5789	4015012	Zytiga Oral Tablet 250 MG	59011041520	OxyCONTIN	Oral '	Tablet	ER	12	Hour
5789	4019506	Zytiga Oral Tablet 500 MG	Abuse-Deterrent 15	MG					
	4064001 ge 100 MG/ML	Tremfya Subcutaneous Solution Prefilled	59011042010 Abuse-Deterrent 20	OxyCONTIN MG	Oral '	Tablet	ER	12	Hour
	4064011 or 100 MG/ML	Tremfya Subcutaneous Solution Pen-	59011042020 Abuse-Deterrent 20	OxyCONTIN MG	Oral '	Tablet	ER	12	Hour
		Vraylar Oral Capsule 1.5 MG	59011043010 Abuse-Deterrent 30	OxyCONTIN MG	Oral '	Tablet	ER	12	Hour
6187	4011520	Vraylar Oral Capsule 1.5 MG	59011043020	OxyCONTIN	Oral '	Tablet	ER	12	Hour
6187	4011530	Vraylar Oral Capsule 1.5 MG	Abuse-Deterrent 30	MG					
6187	4013011	Vraylar Oral Capsule 3 MG	59011044010 Abuse-Deterrent 40	OxyCONTIN MG	Oral '	Tablet	ER	12	Hour
6187	4013020	Vraylar Oral Capsule 3 MG	59011044020	OxyCONTIN	Oral '	Tablet	ER	12	Hour
6187	4013030	Vraylar Oral Capsule 3 MG	Abuse-Deterrent 40	5					
6187	4014530	Vraylar Oral Capsule 4.5 MG	59011046010 Abuse-Deterrent 60	OxyCONTIN MG	Oral '	Tablet	ER	12	Hour
6187	4016030	Vraylar Oral Capsule 6 MG							



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

59011046020 Abuse-Deterrent 60	OxyCONTIN Oral Tablet ER 12 Hour) MG	61953000502 GM/100ML	Flebogamma DIF Intravenous Solution 10
59011048010 Abuse-Deterrent 80	OxyCONTIN Oral Tablet ER 12 Hour) MG	61953000503 GM/200ML	Flebogamma DIF Intravenous Solution 20
59011048020 Abuse-Deterrent 80	OxyCONTIN Oral Tablet ER 12 Hour) MG	61953000504 GM/50ML	Flebogamma DIF Intravenous Solution 5
61919066902	Truvada Oral Tablet 200-300 MG	61953000505 GM/100ML	Flebogamma DIF Intravenous Solution 10
61919070602	Isentress Oral Tablet 400 MG	61953000506	Flebogamma DIF Intravenous Solution 20
61919070606	Isentress Oral Tablet 400 MG	GM/200ML	-
59148001870 Suspension Recons	Abilify Maintena Intramuscular tituted ER 300 MG	61958070101	Truvada Oral Tablet 200-300 MG
59148001871	Abilify Maintena Intramuscular	61958070301	Truvada Oral Tablet 100-150 MG
Suspension Recons	tituted ER 300 MG	61958070401	Truvada Oral Tablet 133-200 MG
59148001970 Suspension Recons	Abilify Maintena Intramuscular tituted ER 400 MG	61958070501	Truvada Oral Tablet 167-250 MG
59148001971	Abilify Maintena Intramuscular	61958080101	Letairis Oral Tablet 5 MG
Suspension Recons	5	61958080105	Letairis Oral Tablet 5 MG
59148003513	Rexulti Oral Tablet 0.25 MG	61958080201	Letairis Oral Tablet 10 MG
59148003613	Rexulti Oral Tablet 0.5 MG	61958080205	Letairis Oral Tablet 10 MG
59148003713	Rexulti Oral Tablet 1 MG	61958180101	Harvoni Oral Tablet 90-400 MG
59148003813	Rexulti Oral Tablet 2 MG	61958180301	Harvoni Oral Tablet 45-200 MG
59148003913	Rexulti Oral Tablet 3 MG	61958180401	Harvoni Oral Packet 45-200 MG
59148004013	Rexulti Oral Tablet 4 MG	61958180501	Harvoni Oral Packet 33.75-150 MG
59148004580	Abilify Maintena Intramuscular Prefilled	61958190101	Genvoya Oral Tablet 150-150-200-10 MG
Syringe 300 MG		61958200201	Descovy Oral Tablet 200-25 MG
59148007280 Syringe 400 MG	Abilify Maintena Intramuscular Prefilled	61958200202	Descovy Oral Tablet 200-25 MG
59310057922	ProAir HFA Inhalation Aerosol Solution	61958210101	Odefsey Oral Tablet 200-25-25 MG
108 (90 Base) MCG	/ACT	61958220101	Epclusa Oral Tablet 400-100 MG
61953000400 GM/400ML	Flebogamma DIF Intravenous Solution 20	61958220301	Epclusa Oral Tablet 200-50 MG
61953000403	Flebogamma DIF Intravenous Solution 5	62559086015	Cortrophin Injection Gel 80 UNIT/ML
GM/100ML		61958250101	Biktarvy Oral Tablet 50-200-25 MG
61953000404 GM/200ML	Flebogamma DIF Intravenous Solution 10	61958250103	Biktarvy Oral Tablet 50-200-25 MG
61953000405	Flebogamma DIF Intravenous Solution 20	60793085001	Levoxyl Oral Tablet 25 MCG
GM/400ML	rieboganinia Dir nu avenous solution 20	60793085010	Levoxyl Oral Tablet 25 MCG
61953000408	Flebogamma DIF Intravenous Solution 5	60793085101	Levoxyl Oral Tablet 50 MCG
GM/100ML	Flebogamma DIF Intravenous Solution 10	60793085110	Levoxyl Oral Tablet 50 MCG
61953000409 GM/200ML		60793085201	Levoxyl Oral Tablet 75 MCG
61953000501	Flebogamma DIF Intravenous Solution 5	60793085210	Levoxyl Oral Tablet 75 MCG
GM/50ML		60793085301	Levoxyl Oral Tablet 88 MCG



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

60793085310	Levoxyl Oral Tablet 88 MCG
60793085401	Levoxyl Oral Tablet 100 MCG
60793085410	Levoxyl Oral Tablet 100 MCG
60793085501	Levoxyl Oral Tablet 112 MCG
60793085510	Levoxyl Oral Tablet 112 MCG
60793085601	Levoxyl Oral Tablet 125 MCG
60793085610	Levoxyl Oral Tablet 125 MCG
60793085701	Levoxyl Oral Tablet 137 MCG
60793085710	Levoxyl Oral Tablet 137 MCG
60793085801	Levoxyl Oral Tablet 150 MCG
60793085810	Levoxyl Oral Tablet 150 MCG
60793085901	Levoxyl Oral Tablet 175 MCG
60793085910	Levoxyl Oral Tablet 175 MCG
60793086001	Levoxyl Oral Tablet 200 MCG
60793086010	Levoxyl Oral Tablet 200 MCG
60846080101	Unithroid Oral Tablet 25 MCG
60846080201	Unithroid Oral Tablet 50 MCG
60846080301	Unithroid Oral Tablet 75 MCG
60846080401	Unithroid Oral Tablet 88 MCG
60846080501	Unithroid Oral Tablet 100 MCG
60846080601	Unithroid Oral Tablet 112 MCG
60846080701	Unithroid Oral Tablet 125 MCG
60846080801	Unithroid Oral Tablet 137 MCG
60846080901	Unithroid Oral Tablet 150 MCG
60846081001	Unithroid Oral Tablet 175 MCG
60846081101	Unithroid Oral Tablet 200 MCG
60846081201	Unithroid Oral Tablet 300 MCG
62856070405 Therapy Pack 4 MG	Lenvima (4 MG Daily Dose) Oral Capsule
62856070430 Therapy Pack 4 MG	Lenvima (4 MG Daily Dose) Oral Capsule
62856070805 Therapy Pack 2 x 4 M	Lenvima (8 MG Daily Dose) Oral Capsule 4G
62856070830	Lenvima (8 MG Daily Dose) Oral Capsule

62856071005 Lenvima (10 MG Daily Dose) Oral Capsule Therapy Pack 10 MG

Therapy Pack 2 x 4 MG

62856071030 Lenvima (10 MG Daily Dose) Oral Capsule Therapy Pack 10 MG

62856071205 Lenvima (12 MG Daily Dose) Oral Capsule Therapy Pack 3 x 4 MG

62856071230 Lenvima (12 MG Daily Dose) Oral Capsule Therapy Pack 3 x 4 MG

62856071405 Lenvima (14 MG Daily Dose) Oral Capsule Therapy Pack 10 & 4 MG

62856071430 Lenvima (14 MG Daily Dose) Oral Capsule Therapy Pack 10 & 4 MG

62856071805 Lenvima (18 MG Daily Dose) Oral Capsule Therapy Pack 10 MG & 2 x 4 MG

62856071830 Lenvima (18 MG Daily Dose) Oral Capsule Therapy Pack 10 MG & 2 x 4 MG

62856072005 Lenvima (20 MG Daily Dose) Oral Capsule Therapy Pack 2 x 10 MG

62856072030 Lenvima (20 MG Daily Dose) Oral Capsule Therapy Pack 2 x 10 MG

62856072405 Lenvima (24 MG Daily Dose) Oral Capsule Therapy Pack 2 x 10 MG & 4 MG

62856072430 Lenvima (24 MG Daily Dose) Oral Capsule Therapy Pack 2 x 10 MG & 4 MG

60505476505 APO-Varenicline Oral Tablet 0.5 MG

60505476606 APO-Varenicline Oral Tablet 1 MG

61755002002 Praluent Subcutaneous Solution Autoinjector 75 MG/ML

61755002102 Praluent Subcutaneous Solution Autoinjector 150 MG/ML

- 63629324501 Lyrica Oral Capsule 100 MG
- 63629336701 Lyrica Oral Capsule 50 MG
- 63629336702 Lyrica Oral Capsule 50 MG
- 63629336703 Lyrica Oral Capsule 50 MG
- 63629336704 Lyrica Oral Capsule 50 MG
- 63629336705 Lyrica Oral Capsule 50 MG
- 63629336706 Lyrica Oral Capsule 50 MG
- 63629336707 Lyrica Oral Capsule 50 MG
- 63629336901 Lyrica Oral Capsule 100 MG
- 63629336902 Lyrica Oral Capsule 100 MG
- 63629336903
 Lyrica Oral Capsule 100 MG

 63629336904
 Lyrica Oral Capsule 100 MG

Lyrica Oral Capsule 100 MG



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

ALTERNATIVES TO EXISTING NET PRICE ESTIMATES BASED UPON FEDERAL SUPPLY SCHEDULE (FSS) PRICING

63004871001	Acthar Injection Gel 80 UNIT/ML	63629459901	OxyCONTIN Oral Tablet
63020007801	Ninlaro Oral Capsule 2.3 MG	Abuse-Deterrent 60	
63020007802	Ninlaro Oral Capsule 2.3 MG	63629460001 Abuse-Deterrent 80	OxyCONTIN Oral Tablet MG
63020007901	Ninlaro Oral Capsule 3 MG	63187002608	Ventolin HFA Inhalation A
63020007902	Ninlaro Oral Capsule 3 MG	108 (90 Base) MCG/	ACT
63020008001	Ninlaro Oral Capsule 4 MG	63402030230	Latuda Oral Tablet 20 MG
63020008002	Ninlaro Oral Capsule 4 MG	63402030401	Latuda Oral Tablet 40 MG
63020023001	Ninlaro Oral Capsule 2.3 MG	63402030410	Latuda Oral Tablet 40 MG
63020023002	Ninlaro Oral Capsule 2.3 MG	63402030430	Latuda Oral Tablet 40 MG
63629377201	OxyCONTIN Oral Tablet ER 12 Hour	63402030601	Latuda Oral Tablet 60 MG
Abuse-Deterrent 20	MG	63402030610	Latuda Oral Tablet 60 MG
63020039001	Ninlaro Oral Capsule 3 MG	63402030630	Latuda Oral Tablet 60 MG
63629377202 Abuse-Deterrent 20	OxyCONTIN Oral Tablet ER 12 Hour MG	63402030801	Latuda Oral Tablet 80 MG
63020039002	Ninlaro Oral Capsule 3 MG	63402030810	Latuda Oral Tablet 80 MG
63629377203	OxyCONTIN Oral Tablet ER 12 Hour	63402030830	Latuda Oral Tablet 80 MG
Abuse-Deterrent 20		63402031230	Latuda Oral Tablet 120 MG
63020040001	Ninlaro Oral Capsule 4 MG	67386082019	Northera Oral Capsule 100
63629377204	OxyCONTIN Oral Tablet ER 12 Hour	67386082119	Northera Oral Capsule 200
Abuse-Deterrent 20		67386082219	Northera Oral Capsule 300
63629377401 Abuse-Deterrent 40	OxyCONTIN Oral Tablet ER 12 Hour MG	68071035330	Lyrica Oral Capsule 75 MG
63629377402	OxyCONTIN Oral Tablet ER 12 Hour	68071035360	Lyrica Oral Capsule 75 MG
Abuse-Deterrent 40		68071035390	Lyrica Oral Capsule 75 MG
63629377403 Abuse-Deterrent 40	OxyCONTIN Oral Tablet ER 12 Hour MG	68071036530	Lyrica Oral Capsule 50 MG
63629377404	OxyCONTIN Oral Tablet ER 12 Hour	68071036560	Lyrica Oral Capsule 50 MG
Abuse-Deterrent 40	MG	68071036590	Lyrica Oral Capsule 50 MG
63629381101	Lyrica Oral Capsule 50 MG	68071038930	Lyrica Oral Capsule 150 MC
63629385701	Lyrica Oral Capsule 75 MG	68071038960	Lyrica Oral Capsule 150 MC
63020040002	Ninlaro Oral Capsule 4 MG	68071038990	Lyrica Oral Capsule 150 MC
63090010030	Nuplazid Oral Tablet 10 MG	68071044790	OxyCONTIN Oral Tablet
63090034030	Nuplazid Oral Capsule 34 MG	Abuse-Deterrent 20	
63629418101	Lyrica Oral Capsule 150 MG	68071047630	Lyrica Oral Capsule 100 MC
63629418102	Lyrica Oral Capsule 150 MG	68071047660	Lyrica Oral Capsule 100 MC
63629418103	Lyrica Oral Capsule 150 MG	68071047690	Lyrica Oral Capsule 100 MC
63629418104	Lyrica Oral Capsule 150 MG	68071066290	Lyrica Oral Capsule 300 MC
63629418105	Lyrica Oral Capsule 150 MG	68071073830 Abuse-Deterrent 10	OxyCONTIN Oral Tablet MG
63629459801	Amitiza Oral Capsule 24 MCG	<u> </u>	

NTIN Oral Tablet ER 12 Hour

NTIN Oral Tablet ER 12 Hour

in HFA Inhalation Aerosol Solution

63402030230	Latuda Ural Tablet 20 MG
63402030401	Latuda Oral Tablet 40 MG
63402030410	Latuda Oral Tablet 40 MG
63402030430	Latuda Oral Tablet 40 MG
63402030601	Latuda Oral Tablet 60 MG
63402030610	Latuda Oral Tablet 60 MG
63402030630	Latuda Oral Tablet 60 MG
63402030801	Latuda Oral Tablet 80 MG
63402030810	Latuda Oral Tablet 80 MG
63402030830	Latuda Oral Tablet 80 MG
63402031230	Latuda Oral Tablet 120 MG
67386082019	Northera Oral Capsule 100 MG
67386082119	Northera Oral Capsule 200 MG
67386082219	Northera Oral Capsule 300 MG
68071035330	Lyrica Oral Capsule 75 MG
68071035360	Lyrica Oral Capsule 75 MG
68071035390	Lyrica Oral Capsule 75 MG
68071036530	Lyrica Oral Capsule 50 MG
68071036560	Lyrica Oral Capsule 50 MG
68071036590	Lyrica Oral Capsule 50 MG
68071038930	Lyrica Oral Capsule 150 MG
68071038960	Lyrica Oral Capsule 150 MG
68071038990	Lyrica Oral Capsule 150 MG
68071044790 Abuse-Deterrent 20	OxyCONTIN Oral Tablet ER 12 Hour MG
68071047630	Lyrica Oral Capsule 100 MG
68071047660	Lyrica Oral Capsule 100 MG
68071047690	Lyrica Oral Capsule 100 MG
68071066290	Lyrica Oral Capsule 300 MG
68071073830 Abuse-Deterrent 10	OxyCONTIN Oral Tablet ER 12 Hour MG



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

68071073860 Abuse-Deterrent 10	OxyCONTIN Oral Tablet ER 12 Hour MG	64406000703 MG	Tecfidera Oral Miscellaneous 120 & 240
68071074090	Lyrica Oral Capsule 200 MG	66215050115	Opsumit Oral Tablet 10 MG
68071074093	Lyrica Oral Capsule 200 MG	66215050130	Opsumit Oral Tablet 10 MG
67544006130	Synthroid Oral Tablet 175 MCG	66215060206	Uptravi Oral Tablet 200 MCG
67544006160	Synthroid Oral Tablet 175 MCG	66215060214	Uptravi Oral Tablet 200 MCG
68071135400	Lyrica Oral Capsule 100 MG	66215060406	Uptravi Oral Tablet 400 MCG
68071135600	Lyrica Oral Capsule 150 MG	66215060606	Uptravi Oral Tablet 600 MCG
68071135800	Lyrica Oral Capsule 200 MG	66215060806	Uptravi Oral Tablet 800 MCG
68071152505 108 (90 Base) MCG,	ProAir HFA Inhalation Aerosol Solution	66215061006	Uptravi Oral Tablet 1000 MCG
64116012101	Esbriet Oral Capsule 267 MG	66215061206	Uptravi Oral Tablet 1200 MCG
68071211306	Isentress Oral Tablet 400 MG	66215061406	Uptravi Oral Tablet 1400 MCG
64208823402		66215061606	Uptravi Oral Tablet 1600 MCG
GM/100ML	Gammaplex Intravenous Solution 5	66215062820 800 MCG	Uptravi Oral Tablet Therapy Pack 200 $\&$
64208823403 GM/200ML	Gammaplex Intravenous Solution 10	66215071801 Reconstituted 1800	Uptravi Intravenous Solution) MCG
64208823404 GM/400ML	Gammaplex Intravenous Solution 20	64597030160	Nuedexta Oral Capsule 20-10 MG
64208823406	Gammaplex Intravenous Solution 5	64764008060	Amitiza Oral Capsule 8 MCG
GM/100ML		64764011901	Colcrys Oral Tablet 0.6 MG
64208823407 GM/200ML	Gammaplex Intravenous Solution 10	64764011907	Colcrys Oral Tablet 0.6 MG
64208823408 GM/400ML	Gammaplex Intravenous Solution 20	64764017130 MG	Dexilant Oral Capsule Delayed Release 30
, 64208823501 GM/50ML	Gammaplex Intravenous Solution 5	64764017530 MG	Dexilant Oral Capsule Delayed Release 60
64208823502 GM/100ML	Gammaplex Intravenous Solution 10	64764017590 MG	Dexilant Oral Capsule Delayed Release 60
64208823503	Gammaplex Intravenous Solution 20	64764024060	Amitiza Oral Capsule 24 MCG
GM/200ML		64764072007	Trintellix Oral Tablet 5 MG
64208823505 GM/50ML	Gammaplex Intravenous Solution 5	64764072030	Trintellix Oral Tablet 5 MG
64208823506	Gammaplex Intravenous Solution 10	64764073030	Trintellix Oral Tablet 10 MG
GM/100ML		64764075007	Trintellix Oral Tablet 20 MG
64208823507 GM/200ML	Gammaplex Intravenous Solution 20	64764075030	Trintellix Oral Tablet 20 MG
66105065203	Januvia Oral Tablet 100 MG	64896066101 23.75-95 MG	Rytary Oral Capsule Extended Release
64406000501 120 MG	Tecfidera Oral Capsule Delayed Release	64896066109 23.75-95 MG	Rytary Oral Capsule Extended Release
64406000602 240 MG	Tecfidera Oral Capsule Delayed Release	64896066199 23.75-95 MG	Rytary Oral Capsule Extended Release



64896066201 36.25-145 MG	Rytary Oral Capsule Extended Release	66302032501 2.5 MG	Orenitram Oral Tablet Extended Release	
64896066209 36.25-145 MG	Rytary Oral Capsule Extended Release	66302032510 2.5 MG	Orenitram Oral Tablet Extended Release	
64896066299 36.25-145 MG	Rytary Oral Capsule Extended Release	66302035001 MG	Orenitram Oral Tablet Extended Release 5	
64896066301 48.75-195 MG	Rytary Oral Capsule Extended Release	66302035010 MG	Orenitram Oral Tablet Extended Release 5	
64896066309 48.75-195 MG	Rytary Oral Capsule Extended Release	66689010710	Vimpat Oral Solution 10 MG/ML	
64896066399	Putary Oral Cancula Extended Poloace	66689010810	Vimpat Oral Solution 10 MG/ML	
48.75-195 MG	Rytary Oral Capsule Extended Release	66689010910	Vimpat Oral Solution 10 MG/ML	
64896066401	Rytary Oral Capsule Extended Release	66689011001	Vimpat Oral Solution 10 MG/ML	
61.25-245 MG		66689011010	Vimpat Oral Solution 10 MG/ML	
64896066499 61.25-245 MG	Rytary Oral Capsule Extended Release	66758095985 108 (90 Base) MCG	Proventil HFA Inhalation Aerosol Solution /ACT	
66267017430	Premarin Oral Tablet 0.625 MG	66869010490	Livalo Oral Tablet 1 MG	
67544088330	Synthroid Oral Tablet 25 MCG	66869020490	Livalo Oral Tablet 2 MG	
67544088360	Synthroid Oral Tablet 25 MCG	66869040490	Livalo Oral Tablet 4 MG	
67544088430	Synthroid Oral Tablet 50 MCG	65649030103	Xifaxan Oral Tablet 200 MG	
67544088460	Synthroid Oral Tablet 50 MCG	65649030141	Xifaxan Oral Tablet 200 MG	
67544088560	Synthroid Oral Tablet 75 MCG	65649030302	Xifaxan Oral Tablet 550 MG	
67544088571	Synthroid Oral Tablet 75 MCG	65649030303	Xifaxan Oral Tablet 550 MG	
67544088660	Synthroid Oral Tablet 88 MCG	65649030304	Xifaxan Oral Tablet 550 MG	
67544088730	Synthroid Oral Tablet 100 MCG	65757040101	Aristada Intramuscular Prefilled Syringe	
67544088760	Synthroid Oral Tablet 100 MCG	441 MG/1.6ML		
67544088860	Synthroid Oral Tablet 125 MCG	65757040103 441 MG/1.6ML	Aristada Intramuscular Prefilled Syringe	
67544088960	Synthroid Oral Tablet 150 MCG	65757040201	Aristada Intromusqu'an Drafillad Suringa	
67544089060	Synthroid Oral Tablet 200 MCG	662 MG/2.4ML	Aristada Intramuscular Prefilled Syringe	
67544089160	Synthroid Oral Tablet 112 MCG	65757040203	Aristada Intramuscular Prefilled Syringe	
66302030001	Orenitram Oral Tablet Extended Release	662 MG/2.4ML		
0.125 MG		65757040301 882 MG/3.2ML	Aristada Intramuscular Prefilled Syringe	
66302030010 0.125 MG	Orenitram Oral Tablet Extended Release	65757040303	Aristada Intramuscular Prefilled Syringe	
66302030201	Orenitram Oral Tablet Extended Release	882 MG/3.2ML		
0.25 MG		65757040401 1064 MG/3.9ML	Aristada Intramuscular Prefilled Syringe	
66302030210 0.25 MG	Orenitram Oral Tablet Extended Release	65757040403	Aristada Intramuscular Prefilled Syringe	
66302031001	Orenitram Oral Tablet Extended Release 1	1064 MG/3.9ML	inistada intranascular ricinica Syringe	
MG	oronation of a rabit Extended Release 1	65757050003 Aristada Initio Intramuscular Prefilled		
66302031010 MG	Orenitram Oral Tablet Extended Release 1	Syringe 675 MG/2.	4ML	

68788722906 N 108 (90 Base) MCG/A	Ventolin HFA Inhalation Aerosol Solution ACT	70370204806 80 MG	Ingrezza Oral Capsule Therapy Pack 40 &
	Ventolin HFA Inhalation Aerosol Solution	71610007130	Lyrica Oral Capsule 25 MG
108 (90 Base) MCG/A		71610007153	Lyrica Oral Capsule 25 MG
68788990002 H 108 (90 Base) MCG/A	ProAir HFA Inhalation Aerosol Solution ACT	71610017709	Jardiance Oral Tablet 25 MG
68875010201	Gattex Subcutaneous Kit 5 MG	71610017715	Jardiance Oral Tablet 25 MG
68875010301	Gattex Subcutaneous Kit 5 MG	71610017730	Jardiance Oral Tablet 25 MG
68982084003	Octagam Intravenous Solution 5	71610017745	Jardiance Oral Tablet 25 MG
GM/100ML		71205038156	Chantix Continuing Month Pak Oral Tablet
68982084004 (GM/200ML	Octagam Intravenous Solution 10	1 MG	
	Octagam Intravenous Solution 5	72189001608 108 (90 Base) MCG/	Ventolin HFA Inhalation Aerosol Solution ACT
GM/50ML	-	71981002007	Oxervate Ophthalmic Solution 0.002 %
68982085003 (GM/100ML	Octagam Intravenous Solution 10	72305002530	Euthyrox Oral Tablet 25 MCG
	Octagam Intravenous Solution 20	72305005030	Euthyrox Oral Tablet 50 MCG
GM/200ML		72305007530	Euthyrox Oral Tablet 75 MCG
68546017060 A	Austedo Oral Tablet 6 MG	72305008830	Euthyrox Oral Tablet 88 MCG
68546017160 A	Austedo Oral Tablet 9 MG	72305010030	Euthyrox Oral Tablet 100 MCG
68546017260 A	Austedo Oral Tablet 12 MG	72305011230	Euthyrox Oral Tablet 112 MCG
68546031730 (Syringe 20 MG/ML	Copaxone Subcutaneous Solution Prefilled	72305012530	Euthyrox Oral Tablet 125 MCG
	Consume Subautoneous Solution Drafilled	72305013730	Euthyrox Oral Tablet 137 MCG
Syringe 40 MG/ML	Copaxone Subcutaneous Solution Prefilled	72305015030	Euthyrox Oral Tablet 150 MCG
	Copaxone Subcutaneous Solution Prefilled	72305017530	Euthyrox Oral Tablet 175 MCG
Syringe 40 MG/ML		72305020030	Euthyrox Oral Tablet 200 MCG
	Xyrem Oral Solution 500 MG/ML	72511076001	Repatha SureClick Subcutaneous Solution
68788692601 H MCG/ACT	Flovent HFA Inhalation Aerosol 44	Auto-injector 140 M	G/ML
69656010330 2	Zejula Oral Capsule 100 MG	72511076002 Auto-injector 140 M	Repatha SureClick Subcutaneous Solution G/ML
69656010390 2	Zejula Oral Capsule 100 MG	75987004005	Pennsaid External Solution 2 %
69800650201 H	Bivigam Intravenous Solution 5 GM/50ML	75987004074	Pennsaid External Solution 2 %
69800650202 H	Bivigam Intravenous Solution 5 GM/50ML	76125090001	Gammaked Injection Solution 1 GM/10ML
69800650301 H GM/100ML	Bivigam Intravenous Solution 10	76125090010 GM/100ML	Gammaked Injection Solution 10
69800650302 H GM/100ML	Bivigam Intravenous Solution 10	76125090011 GM/100ML	Gammaked Injection Solution 10
70370104001 I	Ingrezza Oral Capsule 40 MG	76125090020	Gammaked Injection Solution 20
70370106001 I	Ingrezza Oral Capsule 60 MG	GM/200ML	
70370108001 I	Ingrezza Oral Capsule 80 MG	76125090021 GM/200ML	Gammaked Injection Solution 20
70370204001 I	Ingrezza Oral Capsule 40 MG	76125090050	Gammaked Injection Solution 5 GM/50ML

76125090051 Gammaked Injection Solution 5 GM/50ML

72733590101 Praluent Subcutaneous Solution Autoinjector 75 MG/ML

72733590102 Praluent Subcutaneous Solution Autoinjector 75 MG/ML

72733590202 Praluent Subcutaneous Solution Autoinjector 150 MG/ML

76346007301 Korlym Oral Tablet 300 MG

76346007302 Korlym Oral Tablet 300 MG

73562011001 Zenpep Oral Capsule Delayed Release Particles 10000-32000 UNIT

73562011101 Zenpep Oral Capsule Delayed Release Particles 15000-47000 UNIT

73562011201 Zenpep Oral Capsule Delayed Release Particles 20000-63000 UNIT

73562011301 Zenpep Oral Capsule Delayed Release Particles 3000-10000 UNIT

73562011401 Zenpep Oral Capsule Delayed Release Particles 40000-126000 UNIT

73562011501 Zenpep Oral Capsule Delayed Release Particles 5000-24000 UNIT

73562011601 Zenpep Oral Capsule Delayed Release Particles 25000-79000 UNIT



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES Alternatives to existing net price estimates based upon federal supply schedule (FSS) pricing

Disclaimers

3 AXIS ADVISORS LLC, AN OHIO LIMITED LIABILITY COMPANY ("3 AXIS ADVISORS"), CANNOT GUARANTEE THE VALIDITY OF THE INFORMATION FOUND IN THIS REPORT, DUE IN LARGE PART TO THE FACT THAT THE CONTENT IN THIS REPORT RELIES ON THIRD PARTY, PUBLICLY AVAILABLE INFORMATION THAT 3 AXIS ADVISORS HAS NO ABILITY TO VERIFY INDEPENDENTLY. ALL MATERIALS PUBLISHED OR AVAILABLE IN THIS REPORT (INCLUDING, BUT NOT LIMITED TO TEXT, PHOTOGRAPHS, IMAGES, ILLUSTRATIONS, DESIGNS, OR COMPILATIONS, ALL ALSO KNOWN AS THE "CONTENT") ARE PROTECTED BY COPYRIGHT, AND OWNED OR CONTROLLED BY 3 AXIS ADVISORS OR THE PARTIES CREDITED AS THE PROVIDERS OF THE CONTENT. 3 AXIS ADVISORS ALSO OWNS COPYRIGHT IN THE SELECTION, COORDINATION, COMPILATION, AND ENHANCEMENT OF SUCH CONTENT. YOU SHALL ABIDE BY ALL ADDITIONAL COPYRIGHT NOTICES, INFORMATION, OR RESTRICTIONS CONTAINED IN ANY CONTENT IN THIS REPORT.

THIS REPORT IS PROVIDED ON AN "AS-IS" AND "AS AVAILABLE" BASIS, AND 3 AXIS ADVISORS EXPRESSLY DISCLAIMS ANY AND ALL WARRANTIES AND CONDITIONS OF ANY KIND, WHETHER EXPRESS, IMPLIED, OR STATUTORY, INCLUDING ALL WARRANTIES OR CONDITIONS OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, TITLE, QUIET ENJOYMENT, ACCURACY, OR NON-INFRINGEMENT. SOME JURISDICTIONS DO NOT ALLOW THE EXCLUSION OF IMPLIED WARRANTIES, SO THE ABOVE EXCLUSION MAY NOT APPLY TO YOU.

TO THE MAXIMUM EXTENT PERMITTED BY LAW, IN NO EVENT WILL 3 AXIS ADVISORS BE LIABLE TO YOU OR ANY THIRD PARTY FOR ANY LOST PROFITS OR ANY INDIRECT, CONSEQUENTIAL, EXEMPLARY, INCIDENTAL, SPECIAL OR PUNITIVE DAMAGES ARISING FROM OR RELATING TO THIS REPORT OR YOUR USE OF, OR INABILITY TO USE, THE REPORT, EVEN IF 3 AXIS ADVISORS HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES. ACCESS TO, AND USE OF, THIS REPORT IS AT YOUR OWN DISCRETION AND RISK.

TO THE MAXIMUM EXTENT PERMITTED BY LAW, NOTWITHSTANDING ANYTHING TO THE CONTRARY CONTAINED HEREIN, OUR LIABILITY TO YOU FOR ANY DAMAGES ARISING FROM OR RELATED TO THIS REPORT (FOR ANY CAUSE WHATSOEVER AND REGARDLESS OF THE FORM OF THE ACTION), WILL BE LIMITED TO A MAXIMUM OF ONE HUNDRED US DOLLARS (\$100). THE EXISTENCE OF MORE THAN ONE CLAIM WILL NOT ENLARGE THIS LIMIT. SOME JURISDICTIONS DO NOT ALLOW THE LIMITATION OR EXCLUSION OF LIABILITY FOR INCIDENTAL OR CONSEQUENTIAL DAMAGES, SO THE ABOVE LIMITATION OR EXCLUSION MAY NOT APPLY TO YOU.



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES Alternatives to existing net price estimates based upon federal supply schedule (FSS) pricing

References

¹ Ledan, Seema. "Discussing Brand Versus Generic Medications." U.S Pharmacy- The Leading Journal in Pharmacy, vol. 45, no. 6, pp. 30-32, 18 June 2020, https://www.uspharmacist.com/article/discussing-brand-versus-generic-

medications#:~:text=Generics%20range%20from%2080%25%20to,compared%20with%20their%20brand%20product.&text=Accord ing%20to%20the%20IQVIA%202019,with%20increased%20savings%20every%20year. ² Lal, Renu. "Patents and Exclusivity." FDA/CDER SBIA Chronicles, 19 May 2015, <u>https://www.fda.gov/media/92548/download</u>

³ Emanuel, Ezekiel J. "Big Pharma's Go-To Defense of Soaring Drug Prices Doesn't Add Up." The Atlantic, 23 Mar 2019,

https://www.theatlantic.com/health/archive/2019/03/drug-prices-high-cost-research-and-development/585253

⁴ Emanuel, Ezekiel J. "Big Pharma's Go-To Defense of Soaring Drug Prices Doesn't Add Up." The Atlantic, 23 Mar 2019, https://www.theatlantic.com/health/archive/2019/03/drug-prices-high-cost-research-and-development/585253

⁵ Kreling, David H. "Cost Control for Prescription Drug Programs: Pharmacy Benefit Manager (PBM) Efforts, Effects, and Implications." ASPE, 2000, https://aspe.hhs.gov/cost-control-prescription-drug-programs-pharmacy-benefit-manager-pbm-effortseffects-implications ⁶ Levitt, Frier LLC. " Pharmacy Benefit Manager Expose: How PBMs Adversely Impact Cancer Care While Profiting at the Expense

of Patients, Providers, Employers, and Taxpayers." 3 Axis Advisors, Feb 2022,

https://www.3axisadvisors.com/projects/2022/2/17/pharmacy-benefit-manager-expos-how-pbms-adversely-impact-cancer-carewhile-profiting-at-the-expense-of-patients-providers-employers-and-taxpayers-3aa

⁷ Kang, So-Yeon. Bai, Ge. DiStefano, Michael J. Et al. "Comparative Approaches to Drug Pricing." Annual Review of Public Health, vol. 41, pp. 499-512, April 2020, https://www.annualreviews.org/doi/10.1146/annurev-publhealth-040119-094305

⁸ Kang, So-Yeon. Bai, Ge. DiStefano, Michael J. Et al. "Comparative Approaches to Drug Pricing." Annual Review of Public Health, vol. 41, pp. 499-512, April 2020, https://www.annualreviews.org/doi/10.1146/annurev-publhealth-040119-094305

⁹ Bailey, Laura. "Why are US drug prices so high? What should a presidential policy to lower costs include?" Michigan News, University of Michigan, 29 Oct 2020, https://news.umich.edu/why-are-us-drug-prices-so-high-what-should-a-presidential-policy-tolower-drug-costs-include/ ¹⁰ 46brooklyn, "Glossary of Drug Pricing Terms." *46brooklyn*, 2022, <u>https://www.46brooklyn.com/glossary</u>

¹¹ 46brooklyn. "This is the Way: To Analyze Changes in Brand Drug List Prices." *46brooklyn*, 4 July 2022, https://www.46brooklyn.com/branddrug-boxscore

¹² "The Use of Medicines in the U.S." /QV/A, 27 May 2021, https://www.igvia.com/insights/the-igvia-institute/reports/the-use-ofmedicines-in-the-us

¹³ 42 U.S.C. 1396r–8 [Social Security Act – Payment for Covered Outpatient Drugs] available at: https://www.ssa.gov/OP_Home/ssact/title19/1927.htm

¹⁴ Lieberman, Steven M. Ginsburg, Paul B. Trish, Erin. "Sharing Drug Rebates with Medicare Part D Patients: Why and How." Health Affairs Forefront, 14 Sept 2020, https://www.healthaffairs.org/do/10.1377/forefront.20200911.841771/full/

¹⁵ "Medicare Part D Cost-Sharing Chart." National Council on Aging, 17 Aug 2021, https://www.ncoa.org/article/medicare-part-d-

cost-sharing-chart ¹⁶ 46brooklyn. "Flash Finding" How Drug Money from Sick People Really Works." *46brooklyn,* 11 Nov 2021, https://www.46brooklyn.com/news/111121-money-from-sick-people

¹⁷ "Medicare Part D Cost-Sharing Chart." National Council on Aging, 17 Aug 2021, https://www.ncoa.org/article/medicare-part-dcost-sharing-chart ¹⁸ Fusco, Nicole. Sils, Brian. Graff, Jennifer S. Et al. "Cost-Sharing and Adherence, Clinical Outcomes, Health Care Utilization, and

Costs: A systematic Literature Review." J Manag Care Spec Pharm, pp. 1-13, 7 April 2022,

https://pubmed.ncbi.nlm.nih.gov/35389285/ ¹⁹ Ippolito, Benedic, Levy, Joseph. "Best Practices using SSR Health Net Drug Pricing Data." *Health Affairs Forefront,* 10 March 2022, https://www.healthaffairs.org/do/10.1377/forefront.20220308.712815/

²⁰ Hernandez, Inmaculada. San-Juan-Rodriguez, Alvaro. Good, Chester B. "Changes in List Prices, Net Prices, and Discounts for Branded Drugs in the US, 2007-2018." JAMA. vol. 323, no. 9, pp. 854-862, 3 March 2020, https://jamanetwork.com/journals/jama/fullarticle/2762310

²¹ "Prescription Drugs: Department of Veterans Affairs Paid about Half as Much as Medicare Part D for Selected Drugs in 2017." U.S. GAO, 14 Jan 2021, https://www.gao.gov/assets/gao-21-111.pdf

²² "Better Oversight is Required, but Veterans Are Getting Needed Drugs." U.S. GAO, Jan 2001, https://www.gao.gov/assets/gao-01-183.pdf

²³ "A Comparison of Brand-Name Drug Prices Among Selected Federal Programs." Congressional Budget Office, Feb 2021, https://www.cbo.gov/publication/57007#footnote-026-backlink

²⁴ "Subpart 538.2- Establishing and Administering Federal Supple Schedules" General Services Acquisition Manual (GSAM), 1 April 2022, https://www.acquisition.gov/gsam/part-538

²⁵ "A Comparison of Brand-Name Drug Prices Among Selected Federal Programs." Congressional Budget Office, Feb 2021, https://www.cbo.gov/publication/57007#footnote-026-backlink

²⁶ Reynolds, Sara. "Fact Check/Ohio Issue 2 and VA Drug Price Availability." Ballotpedia, 19 Oct 2019, https://ballotpedia.org/Fact_check/Ohio_lssue_2_and_VA_drug_price_availability ²⁷ Beasley, Deena. "California Voters Turn down Drug Pricing Initiative." Reuters, 9 Nov 2016, https://www.reuters.com/article/ususa-election-pharmaceuticals/california-voters-turn-down-drug-pricing-initiative-idUSKBN134120 ²⁸ Ross, Casey. "Ohio Voters Reject Measure to Rein in Drug Costs." STAT, 7 Nov. 2017, https://www.statnews.com/2017/11/07/ohio-drug-costs-ballot/



ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES

²⁹ "Prescription Drugs: Department of Veterans Affairs Paid about Half as Much as Medicare Part D for Selected Drugs in 2017." U.S. GAO, 14 Jan 2021, https://www.gao.gov/assets/gao-21-111.pdf

³⁰ A Comparison of Brand-Name Drug Prices among Selected Federal Programs." Congressional Budget Office, Feb 2021, https://www.cbo.gov/publication/57007#footnote-026-backlink ³¹ "Prices for Brand-Name Drugs under Selected Federal Programs." *Congressional Budget Office*, June 2005,

https://www.cbo.gov/sites/default/files/109th-congress-2005-2006/reports/06-16-prescriptdrug.pdf ³² "A Comparison of Brand-Name Drug Prices among Selected Federal Programs." *Congressional Budget Office*, Feb 2021, https://www.cbo.gov/publication/57007#footnote-026-backlink ³³ Ippolito, Benedic, Levy, Joseph. "Best Practices using SSR Health Net Drug Pricing Data." *Health Affairs Forefront,* 10 March

2022, https://www.healthaffairs.org/do/10.1377/forefront.20220308.712815/

³⁴ "Pharmaceutical Prices." Office of Procurement, Acquisition and Logistics(OPAL): U.S Department of Veteran Affairs, 6 July 2022 https://www.va.gov/opal/nac/fss/pharmPrices.asp ³⁵ "Subpart 538.2- Establishing and Administering Federal Supple Schedules" *General Services Acquisition Manual (GSAM)*, 1 April

2022, https://www.acquisition.gov/gsam/part-538

³⁶ "VA Federal Supple Schedule Service." U.S Department of Veterans Affairs, 2022, https://www.fss.va.gov

³⁷ Liu, Patrick. Dhruva, Sanket S. Shah, Nilay D. Et al. "Trends in Within-Class Changes in US Average Wholesale Prices for Brand-Name Medications for Common Conditions From 2015 to 2020." *JAMA*, vol. 4, no. 1, 22 Jan 2021,

https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2775405

³⁸ Sood, Neeraj. Ribero, Rocio. Ryan, Martha. Et al. "The Association Between Drug Rebates and List Prices." University of Southern California: Schaeffer, 11 Feb 2020, https://healthpolicy.usc.edu/research/the-association-between-drug-rebates-and-listprices/ ³⁹ Bai, Ge. Sen, Aditi P. Anderson, Gerard F. "Pharmacy Benefit Managers, Brand-Name Drug Prices and Patient Cost Sharing."

Annals of Internal Medicine, vol. 168, no. 6, 20 March 2018, https://www.acpjournals.org/doi/10.7326/M17-2506

⁴⁰ Hernandez, Inmaculada. San-Juan-Rodriguez, Alvaro. Good, Chester B. "Changes in List Prices, Net Prices, and Discounts for Branded Drugs in the US, 2007-2018." JAMA. vol. 323, no. 9, pp. 854-862, 3 March 2020, https://jamanetwork.com/journals/jama/fullarticle/2762310

⁴¹ Fein, Adam J. "Five Top Drugmakers Reveal List vs. Net Price Gaps (Plus: The Trouble With Insulin Prices)." Drug Channels: Expert Insights on Pharmaceutical Economics and the Drug Distribution System, 11 Aug. 2020,

www.drugchannels.net/2020/08/five-top-drugmakers-reveal-list-vs-net.html ⁴² Eli Lilly and Company. "Integrated Summary Report." *Lilly Corporate Center*, 2019,

https://assets.ctfassets.net/srys4ukjcerm/4OhD66szgxpdHhhCqzE2Ev/983bd8407c49928f309936e1161bec47/Lilly-2019-Integrated-Summary-Report.pdf#page=23

⁴³ Schmidt, Rachel; Suzuki, Shinobu. "Initial findings from MedPAC's analysis of Part D data on drug rebates and discounts."MedPac, 7 Apr. 2022, MedPac public meeting. GoToWebinar. Slides available at: https://www.medpac.gov/wpcontent/uploads/2021/10/MedPAC-DIR-data-slides-April-2022.pdf

⁴⁴ Schmidt, Rachel; Suzuki, Shinobu. "Initial findings from MedPAC's analysis of Part D data on drug rebates and discounts."MedPac, 7 Apr. 2022, MedPac public meeting. GoToWebinar. Slides available at: https://www.medpac.gov/wpcontent/uploads/2021/10/MedPAC-DIR-data-slides-April-2022.pdf

⁴⁵ <u>https://news.gallup.com/poll/402941/high-cost-healthcare-voters-minds.aspx</u>

⁴⁶ "A Comparison of Brand-Name Drug Prices Among Selected Federal Programs." Congressional Budget Office, Feb 2021, https://www.cbo.gov/publication/57007#footnote-026-backlink

⁴⁷ Levitt, Jonathan E. Lee, Dae Y. "Cautionary tale: Plan sponsors losing manufacturer rebate dollars to PBMs through rebate aggregators." BenfitsPRO, 15 April 2021, https://www.benefitspro.com/2021/04/15/cautionary-tale-plan-sponsors-losing-

manufacturer-rebate-dollars-to-pbms-through-rebate-aggregators/?slreturn=20220607134002 ⁴⁸ Livingston, Shelby. "Powerful Drug-Industry Middlemen Have Quietly Launched Businesses to get Better Deals from Drugmakers. It could Drive up costs for Patients." Business Insider, 22 Nov 2021, https://www.businessinsider.com/inside-pharmacy-benefitmanagers-new-drug-negotiating-businesses-2021-11

"Subpart 538.2- Establishing and Administering Federal Supple Schedules" General Services Acquisition Manual (GSAM), 1 April 2022, https://www.acquisition.gov/gsam/part-538

⁵⁰ "Unit Rebate Amount Calculation for Single Source or Innovator Multiple Source Drugs." Medicaid,

https://www.medicaid.gov/medicaid/prescription-drugs/medicaid-drug-rebate-program/unit-rebate-calculation/unit-rebate-amountcalculation-for-single-source-or-innovator-multiple-source-drugs/index.html ⁵¹ "How The Medicaid Rebate on Prescription Drugs Affects Pricing in the Pharmaceutical Industry." *Congressional Budget Office*,

Jan 1996, https://www.cbo.gov/sites/default/files/104th-congress-1995-1996/reports/1996doc20.pdf

⁵² Duggan, Mark. Morton, Fiona Scott. "The Distortionary Effects of Government Procurement: Evidence from Medicaid Prescription Drug Purchasing." The Quarterly Journal of Economics, vol. 121, no. 1, 1 Feb 2006, <u>https://academic.oup.com/qje/article-abstract/121/1/1/1849004?redirectedFrom=fulltext</u>

⁵³ Park, E. "Clearing Up Confusion about the Medicaid Rebate Program [Part I to III]" Georgetown University Health Policy Institute, Feb 2019, https://ccf.georgetown.edu/2019/02/11/clearing-up-confusion-about-the-medicaid-rebate-program-part-i/

⁵⁴ Ippolito, Benedic, Levy, Joseph. "Best Practices using SSR Health Net Drug Pricing Data." Health Affairs Forefront, 10 March 2022, https://www.healthaffairs.org/do/10.1377/forefront.20220308.712815/

⁵⁵ Schladen, Marty. "Deep Inside the Gun Bill: A Break for Drug Middlemen." Ohio Capital Journal, 6 June 2022,

https://ohiocapitaljournal.com/2022/06/22/deep-inside-the-gun-bill-a-break-for-drug-middlemen/ ⁵⁶ 46brooklyn. "What Drugs Cost in Medicare Part D." *46brooklyn*, 30 Dec 2020, <u>https://www.46brooklyn.com/part-d-drug-pricing-</u> dashboard 57 2 A

3 Axis Advisors "Deserving of Better: How American Seniors are Paying for Misaligned Incentives Within Medicare Part D." 3 Axis Advisors, March 2022,

https://static1.squarespace.com/static/5c326d5596e76f58ee234632/t/6227c19bb627ea166a79fad3/1646772638039/3Axis_Medicar DIR_FINAL_VER_20220308

ESTIMATES OF U.S. NET COMMERCIAL BRAND DRUG PRICES