

**From:** [REDACTED]  
**To:** [ETF SMB Board Feedback](#)  
**Subject:** Navitas proposal  
**Date:** Thursday, May 18, 2023 1:33:41 PM  
**Attachments:** [23 05 WI Natl MS Society Request to WI GIB to oppose Co-pay Max.pdf](#)

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Dear Herschel Day, Nancy Thompson, Dan Fields, Erin Hillson, Walter Jackson, & Nathan Ugoretz,

I am writing to urge you to oppose the proposal of Navitas Health Care regarding the Co-pay Max program. It is in direct contrast to the WI All Copays Count bills AB 103 and SB 100, and Governor Tony Evers's ban on copay accumulator policies in his executive budget proposal.

As an MS patient for the past 30 years I can tell you what a relief it was when drugs were finally invented to slow the progression of this progressive deadly disease. However each drug costs over \$100,000.00 annually to each patient. 40% of all patients who need these drugs do NOT take them because of the cost. This includes 70,000 veterans.

Some of us have co-pay programs which make access to the drugs possible. BUT co-pay accumulator policies take that out of our hands. How would you ever think that is the humanitarian way to treat employees & others?

You have the wisdom to discern what is going on here, if you didn't, you wouldn't be on the board. With all that comes power & I urge you to use it to do good.

Attached is a letter from some of my colleagues which explains it better than I have.

Sincerely,

Annette Huston, BSN,RN, National MS Society District Activist Leader

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May 2023

Herschel Day, Chair  
WI Group Insurance Board  
c/o Board Liaison WI Dept. of Employee Trust Funds  
P.O. Box 7931  
Madison, WI 53707

Dear Chairman Day and Members of the WI Group Insurance Board:

On behalf of the National Multiple Sclerosis Society in Wisconsin, we strongly urge the Wisconsin Group Insurance Board (GIB) to vote against the Navitus' Copay-Max Plus Program as part of the proposed 2024 benefit changes for the state employee and retiree health plan. This copay accumulator program would threaten prescription drug affordability and access for people who live with multiple sclerosis (MS) across Wisconsin and would allow Wisconsin health plans and pharmacy benefit managers (PBMs) to prohibit financial third-party copay assistance.

MS is an unpredictable disease of the central nervous system. Currently, there is no cure. Symptoms vary from person to person and may include disabling fatigue, mobility challenges, cognitive changes, and vision issues. An estimated 1 million people live with MS in the United States. Early diagnosis and treatment are critical to minimize disability. Significant progress is being made to achieve a world free of MS.

When someone is diagnosed with MS, their clinician will typically prescribe a medication referred to as a disease-modifying therapy (DMT). DMTs are used to modify the disease course, treat relapses, and manage symptoms. Growing evidence indicates that early and ongoing treatment with DMTs is the best way to prevent the accumulation of disability and protect the brain from permanent damage due to MS.

As described in 'The Use of Disease Modifying Therapies in Multiple Sclerosis: Principles and Current Evidence', these treatments are not interchangeable. MS is a highly complex disease; no two persons will respond equally to the same treatment. The optimal use of a DMT depends on carefully matching each individual to the therapy best suited to their disease and circumstances.

A person with MS spends three times as much out-of-pocket than the average person in employer plans. DMTs are approximately 75% of the cost of treating MS and are essential for people living with MS—but their prices have skyrocketed.

In 2023, the median annual price of MS DMTs is \$97,500. Six of the MS DMTs have increased in price by more than 200% since they came on the market, with nine now priced at over \$100,000. Although there are now more than 20 DMTs on the market (including three generic copies of the same DMT),

competition has not driven down their price, and the majority have increased in price several times each year.

Copay assistance programs have been used to lower the out-of-pocket costs of high-priced drugs for consumers who rely on and qualify for them. Subsequently, these programs have been shown to increase drug utilization by patients, which lead to a better health outcome. Furthermore, patients did not require future inpatient and outpatient services due to increased drug utilization.<sup>1</sup>


However, health plans increasingly refuse to apply copay assistance to a patient's out-of-pocket maximum or deductible. This practice threatens ongoing access to timely treatments for MS patients. The results can be devastating and can include delayed care, unplanned debt, financial hardship, and interruptions in treatment that can be life-threatening for some people.

The proposed Navitus' Copay-Max Plus program for state employee and retiree health plans takes advantage of drug manufacturer coupons and copay assistance programs applied to many high-cost drugs at the expense of patients.

Under the proposed program, the health plan determines the patient's copay based on the maximum amount of manufacturer copay assistance available rather than on the list or net price of the medication. Enrollees may then be required to enroll in copay assistance to gain access to needed medication. By implementing this policy, the health plan receives the entire possible amount of copay assistance without applying it towards the individual's deductible or annual out-of-pocket limit, meaning the patient does not receive the intended benefit of the assistance.

**On behalf of the National Multiple Sclerosis Society, we encourage you to vote against the proposed Navitus' Copay-Max Plus Program, which is in direct contrast to the WI All Copays Count bills AB 103 and SB 100, and Governor Tony Evers's ban on copay accumulator policies in his executive budget proposal. We ask you to ensure that all forms of financial assistance can be applied toward a patient's deductible. Please consider the needs of people living with MS to access the treatments they need to live their best lives.**

Sincerely,



Jim Turk, Chair  
Wisconsin Government Relations Advisory Committee  
National Multiple Sclerosis Society



Rob Multerer  
President, Wisconsin  
National Multiple Sclerosis Society

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<sup>1</sup> The University of Chicago. "The Patient Impact of Manufacturing Copay Assistance in an Era of Rising Out-of-Pocket Costs." December 2021.