

From: [Rob Gundermann](#)
To: [ETF SMB Board Feedback](#)
Subject: Proposed State Insurance Plan Modification (Navitus)
Date: Monday, July 24, 2023 1:16:46 PM
Attachments: [GIB 7 24 23.docx](#)

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Please find attached our letter to the GIB regarding the proposed implementation of the Navitus AGS plan.

Best,
Rob

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Robert M. Gundermann
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Coalition of Wisconsin Aging & Health Groups

Financial Empowerment – Personal Advocacy – Victim Rights

The Coalition of Wisconsin Aging and Health Groups is a nonprofit, nonpartisan, statewide membership organization that was founded in 1977.

“Advocating for all Generations”

July 24, 2023

Group Insurance Board
c/o Board Liaison
Wisconsin Department of Employee Trust Funds
PO Box 7931
Madison, WI 53707-7931

RE: Opposition to Implementation of Navitus Program

Members of the Group Insurance Board (GIB):

On behalf of the Coalition of Wisconsin Aging and Health Groups and the Wisconsin All Copays Count Coalition, we write to express continued concerns with the Navitus' Program that the Group Insurance Board (GIB) is considering as part of proposed 2024 benefit changes for state employees and retirees, as well as some new concerns based on the Department of Employee Trust Funds (ETF) memo of July 7th.

Coalition members met with representatives of the ETF and appreciated having some of our questions answered and getting a better understanding of the program. However, some of our original concerns persist and some additional questions and concerns have arisen.

Globally we have a public policy concern with the direction ETF is pursuing with their pharmacy benefit manager (PBM) Navitus. From our understanding of this proposed program, it is an attempt to capture manufacturer assistance program funds designed for patients who have little or no insurance coverage under the premise that currently ETF is “leaving money on the table.”

We do not currently believe state of Wisconsin employees are utilizing patient assistance programs because the state of Wisconsin has a very generous pharmacy benefit program. The state's program is a model for other employers and sets a standard for what other employers should be providing as a benefit to their employees.

By adopting this scheme, ETF would be encouraging state employees to enroll in these programs and “attempt” to draw down additional funds from manufacturers intended for patients with no or little insurance. ETF is uncertain if this program will even work, and has termed the potential additional funds, if captured, as “gravy” which they say could potentially benefit premiums, as well as Navitus through a percentage (we have heard 20%) of funds captured from the manufacturers.

By enrolling state of Wisconsin employees in patient assistance programs intended for the most vulnerable, ETF and Navitus are jeopardizing the sustainability of those programs and attempting to move Wisconsin in a different direction of Wisconsin Governor Tony Evers' last two budget proposals and bipartisan legislation working its way through the Legislature and adopted by 19 other states.



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In addition to our overwhelming concern with the message this program sends on behalf of the state of Wisconsin, below are some questions that were raised by Coalition members during and following the ETF meeting.

1. How would patients be educated about the plan? There are scenarios where the Navitus plan would be harmful to the patient, how would this be explained?
2. Our members are asking how they could quickly educate the people they serve with regard to when they should sign up for the Navitus plan and when they should not.
3. Is it good public policy to tap into a program designed to help patients and utilize the funding in a way that does not provide additional help to patients?
4. Will manufacturers change their copay assistance programs in Wisconsin when they realize maximizer programs are being used and how would that impact patients? Could they find out at the pharmacy counter that their medication is no longer covered?
5. Many patients rely upon copay assistance to pay for their medications and several members have expressed concern that adding a copay maximizer to the State Insurance Plan could elicit changes to copay assistance programs they utilize outside of the State Insurance Plan.
6. Manufacturers have entered contractual relationships with Navitus to provide rebates for their products. Would enrolling patients in these programs violate those contracts and jeopardize the rebates that are supposed to be passed through to ETF?

Lastly, the ETF memo of July 7th states that ***“In states, like Illinois, where legislation like SB 100 and AB 103 were signed into law, Navitus does not offer the AGS program. Navitus has said that if the current versions of SB 100 and AB103 were signed into law in Wisconsin, they would end the AGS program for their Wisconsin clients.”***

We believe it would be unwise to proceed with implementation while legislation is pending in both houses that has broad support in both the Legislature and Governor’s office which, if passed, would require the ETF to backtrack and stop offering this plan. This would be extremely confusing for patients and a waste of resources.

For these reasons, the Coalition of Wisconsin Aging and Health Groups and the Wisconsin All Copays Counts Coalition asks the Group Insurance Board to delay implementation of the Navitus plan.

Sincerely,

Rob Gundermann
President and CEO, Coalition of Wisconsin Aging and Health Groups
Chair, Wisconsin All Copays Count Coalition

More information about copay maximizers and the *Wisconsin All Copays Count* Coalition can be found at: <https://www.wi4patients.com>.