

# CareForum 2022

The WellSky® Conference

## Emerging Trends For Payers

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# Agenda

- Medicare Advantage market
- Commercial and ACA markets
- Prescription Drug market

# Medicare Advantage

# The emerging dominance of Medicare Advantage

## **Medicare Advantage is likely to have more enrollees than FFS by end of decade**

- MA plans offer extra benefits—dental, vision, OTC, wellness, etc.
- MAPD plans have lower premiums than FFS + MediGap + Part D
- The market is highly concentrated and has huge marketing / sales capabilities
- The parent firms (holding companies) are huge and profitable

# What makes MA so successful?

- Increase income by “optimizing” risk adjustment—finding more diagnoses than FFS increases federal payment above FFS (*unquestionable*)
- The benchmark includes the induced utilization of MediGap / supplemental insurance, which has been estimated at 20% (*some debate over how much*)
- Selection of healthier risks via benefit designs (less certain than a. and b.)
- Selection of healthier risks by profiling providers for inclusion in network (*some debate over how much*)

# Future of Medicare FFS: Death spiral of adverse selection

- As MA attracts more lives and better risks, the worse risks in FFS will increase per-capita FFS spending
- As FFS spending increases, the benchmarks increase, which increases federal payments to MA plans
- Higher payments to MA plans can fund more generous supplemental benefits, which will attract more beneficiaries.
  - MA benefits addressing SDoH (housing, food, etc.) may be seen as part of safety net.
- Larger MA plans will have more negotiating power with independent providers

# Dominance of MA: Implications

- Providers will continue to consolidate to build negotiating power
- Private equity will fund physician consolidation as they can pay owners above-(traditional) market and marginalize earlier career physicians
- Supply chain will become more consolidated and powerful, which will lead to shortages
- Prices will increase as waste is converted into profits
- Anti-monopolists may focus on healthcare

# Commercial and ACA



# Topics covered

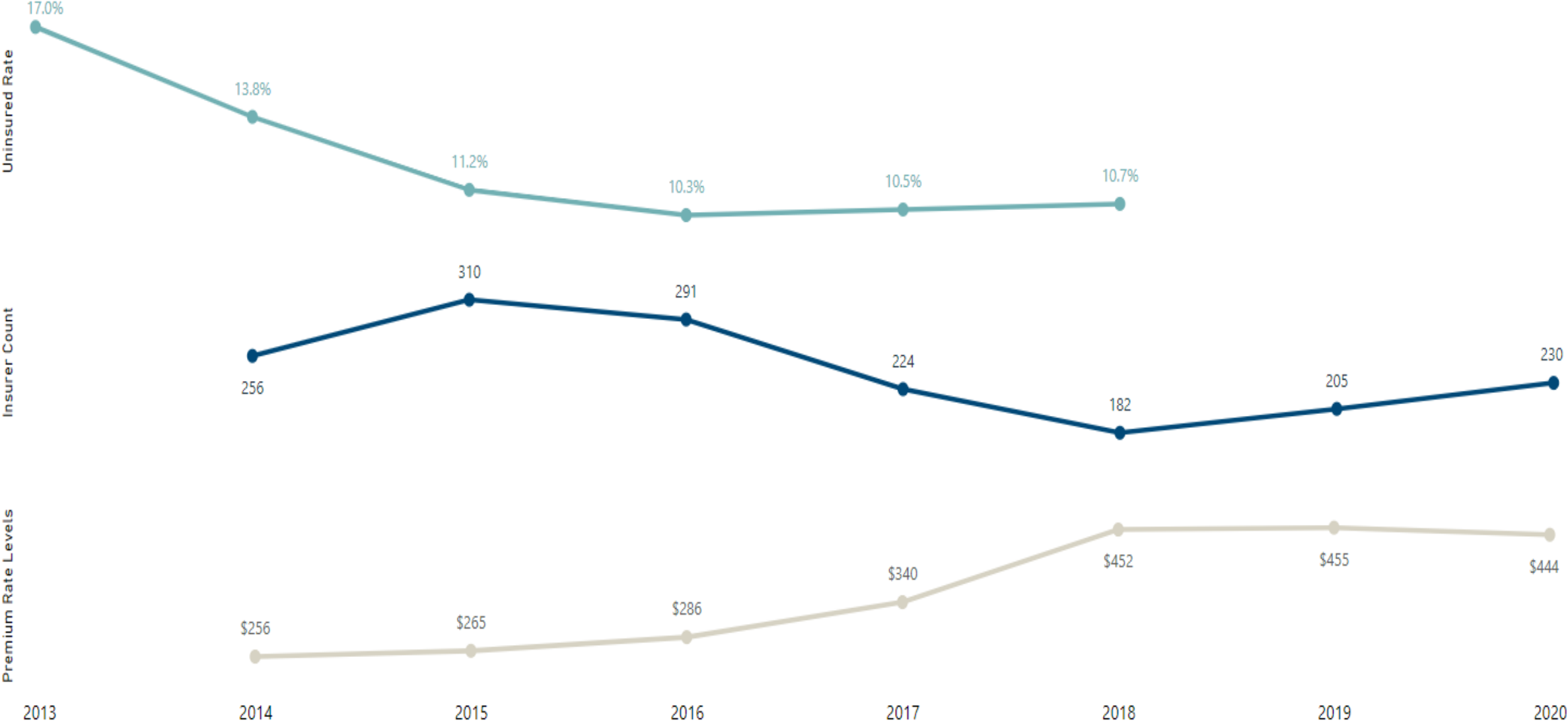


- Evolution of ACA
- Commercial health insurance enrollment changes
- Commercial insurer financial results
- Where is the market headed?

# ACA goals

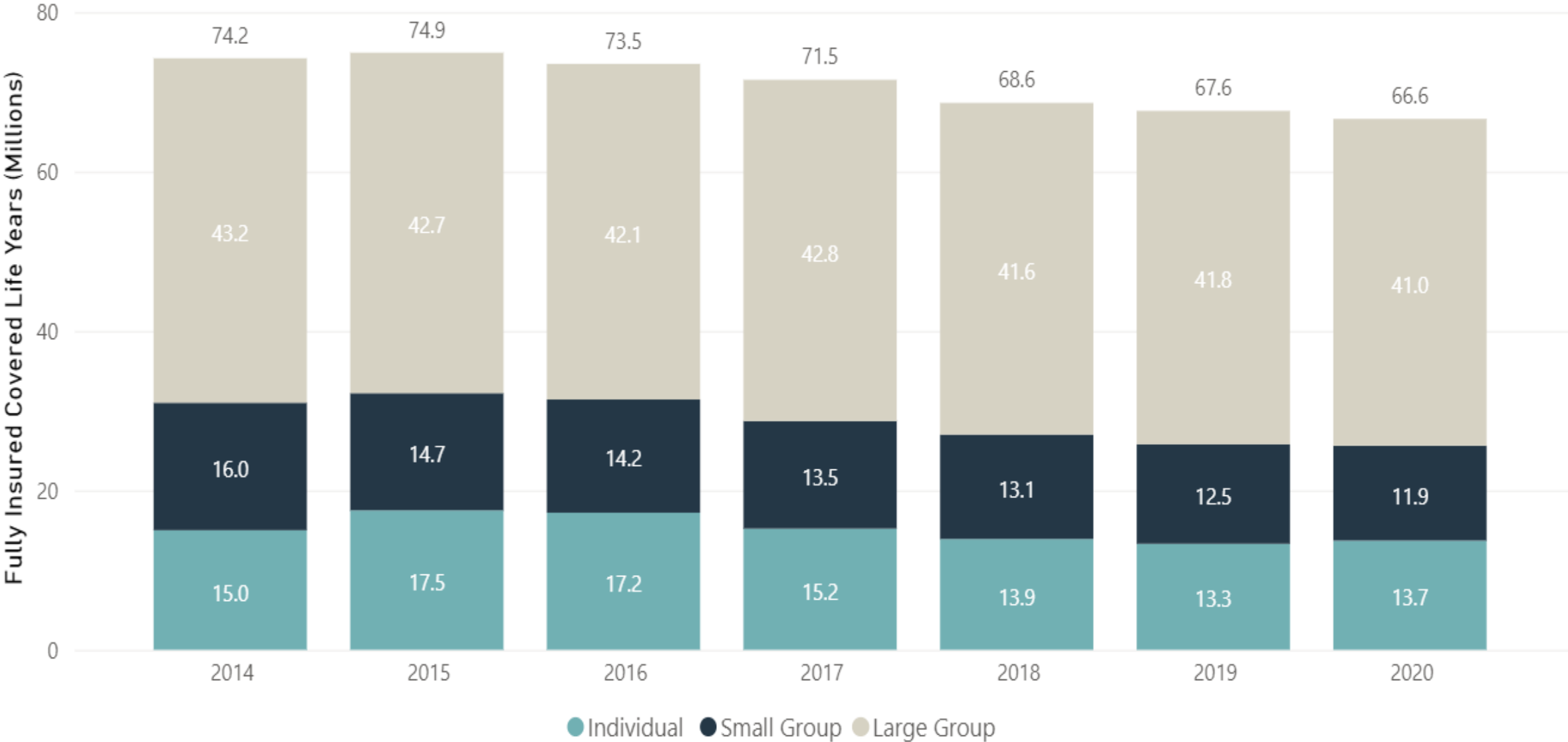
- Lower uninsured rate
- Increasing competition in the market
- Premium stability and affordability

# SELECT NATIONWIDE METRICS ASSOCIATED WITH ACA'S STATED GOALS



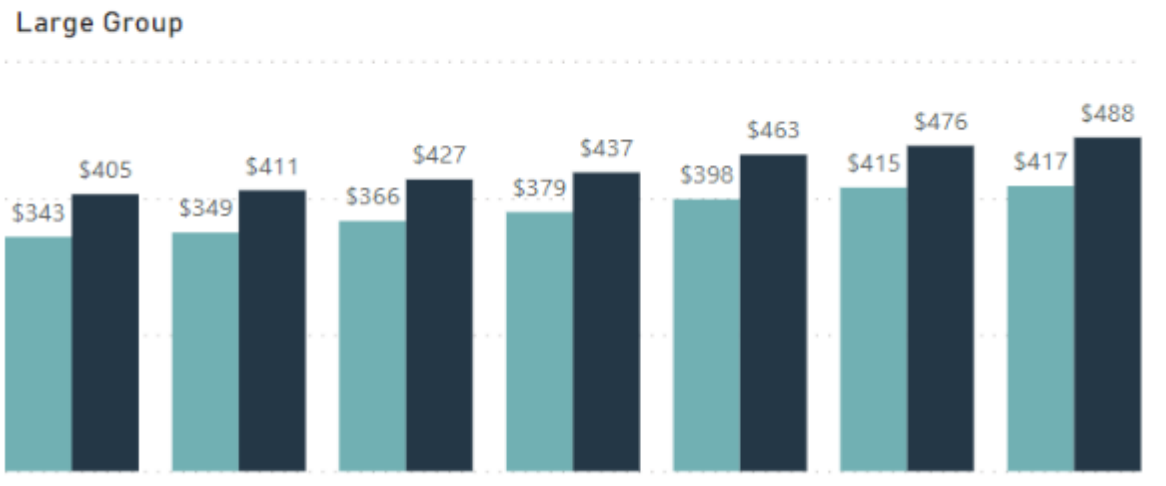
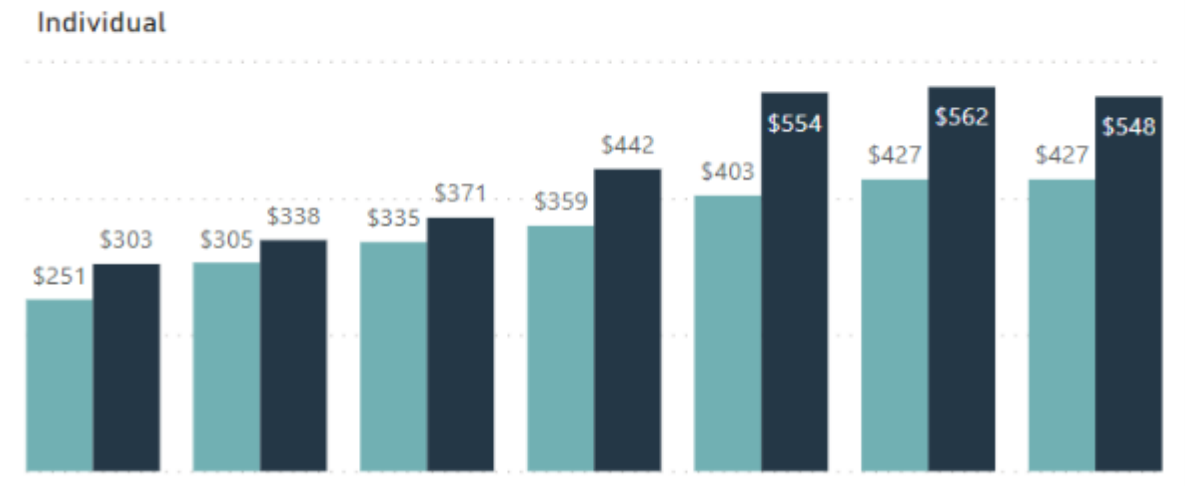
Source: <https://www.soa.org/49be6c/globalassets/assets/files/resources/research-report/2020/50-states-50-stories.pdf>

# NATIONAL COMPREHENSIVE HEALTH INSURANCE ENROLLMENT, 2014 TO 2020



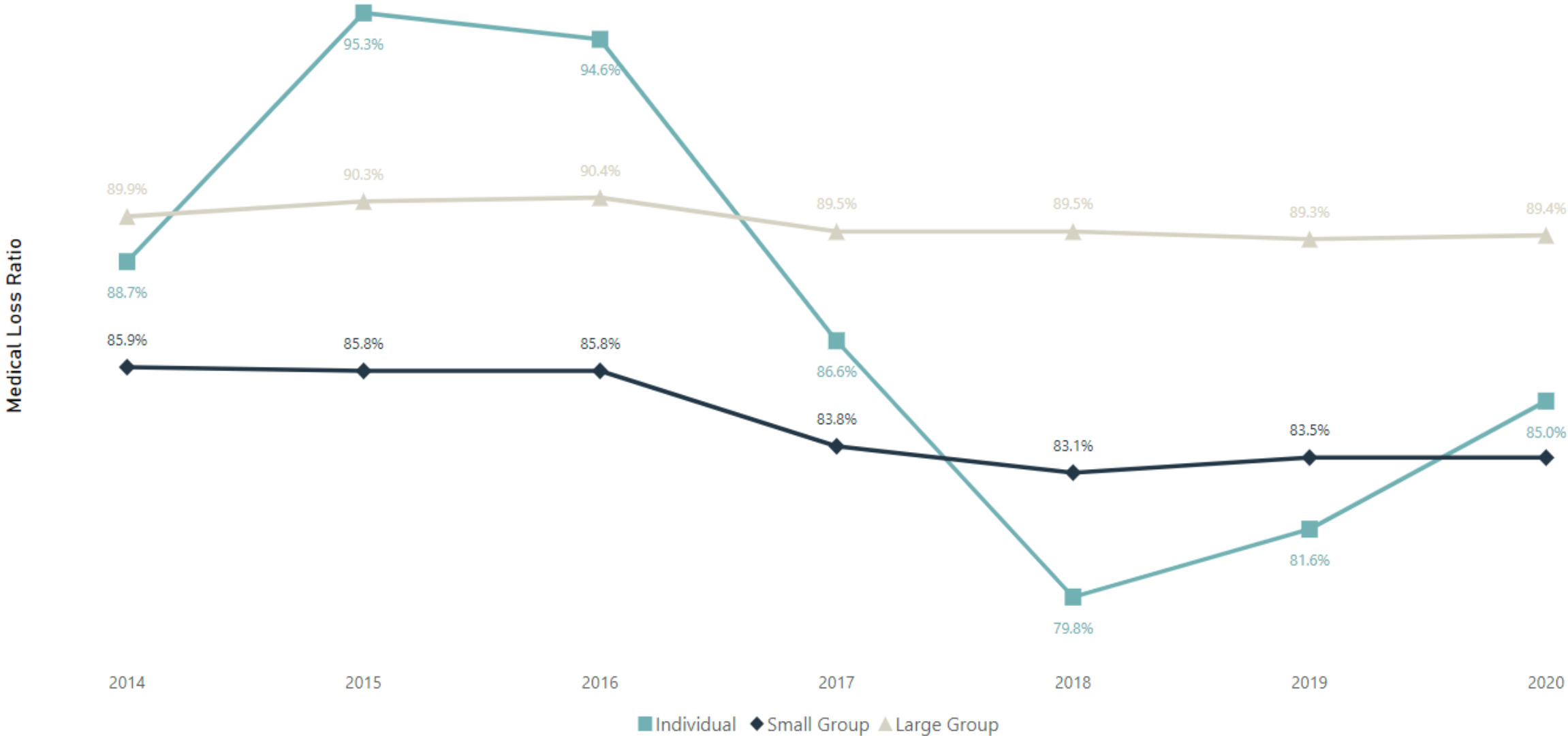
Source: [https://www.milliman.com/-/media/milliman/pdfs/2022-articles/7-18-22\\_commercial-health-insurance-2020-financial-result.ashx](https://www.milliman.com/-/media/milliman/pdfs/2022-articles/7-18-22_commercial-health-insurance-2020-financial-result.ashx)

# CLAIMS EXPENSES AND EARNED PREMIUM, 2014 TO 2020



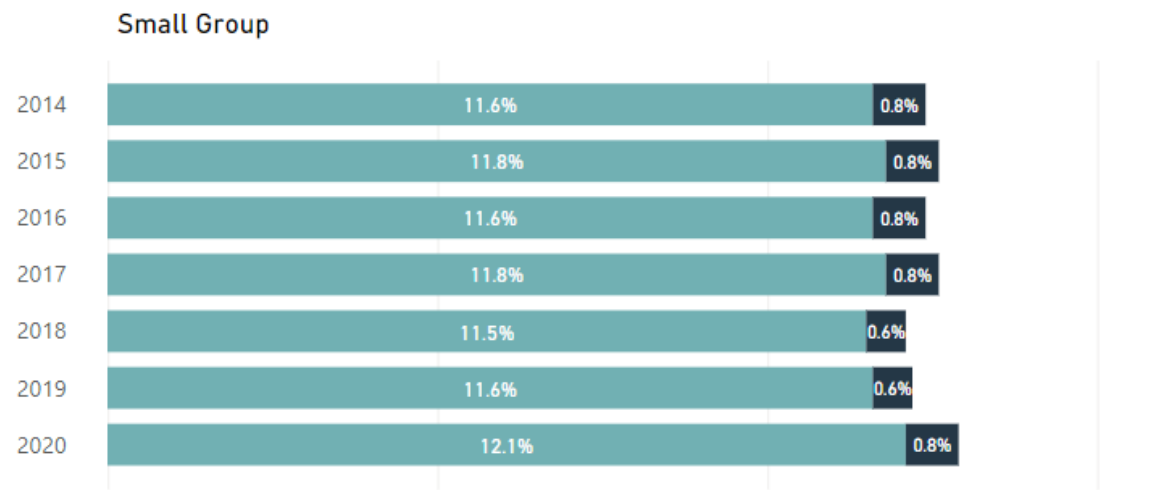
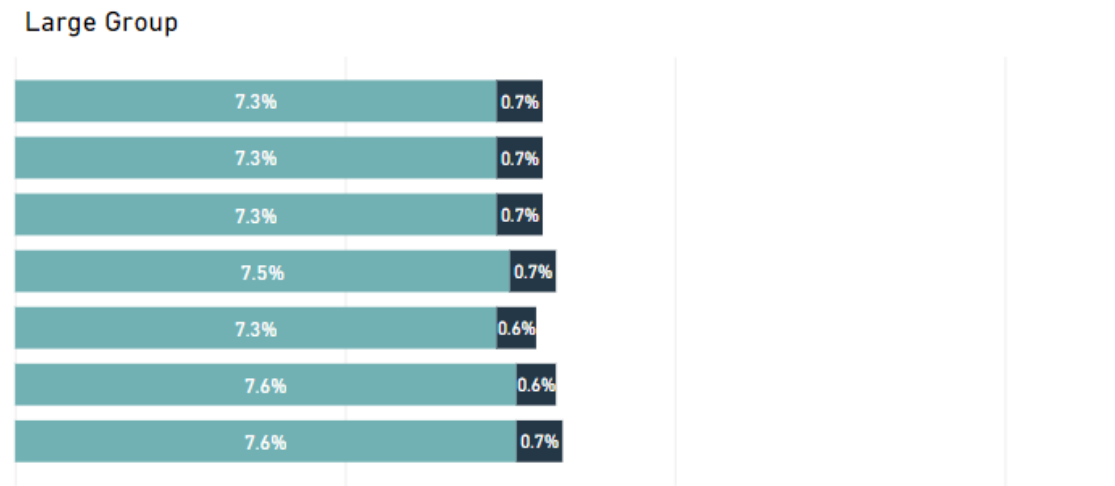
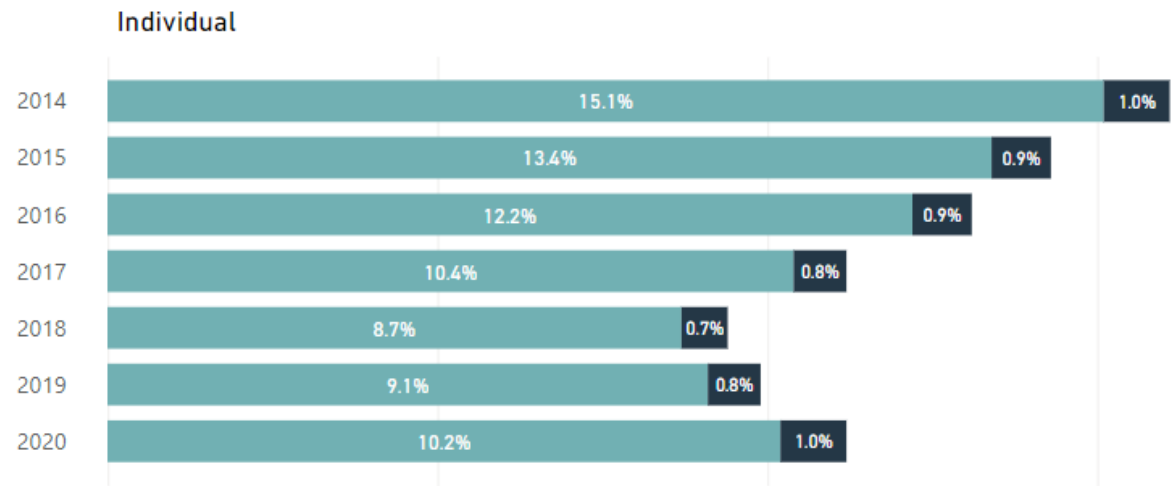
● Claims ● Earned Premium

# PRELIMINARY MEDICAL LOSS RATIO 2014 THROUGH 2020



Source: [https://www.milliman.com/-/media/milliman/pdfs/2022-articles/7-18-22\\_commercial-health-insurance-2020-financial-result.ashx](https://www.milliman.com/-/media/milliman/pdfs/2022-articles/7-18-22_commercial-health-insurance-2020-financial-result.ashx)

## ADMINISTRATIVE EXPENSE AS A PERCENTAGE OF EARNED PREMIUM

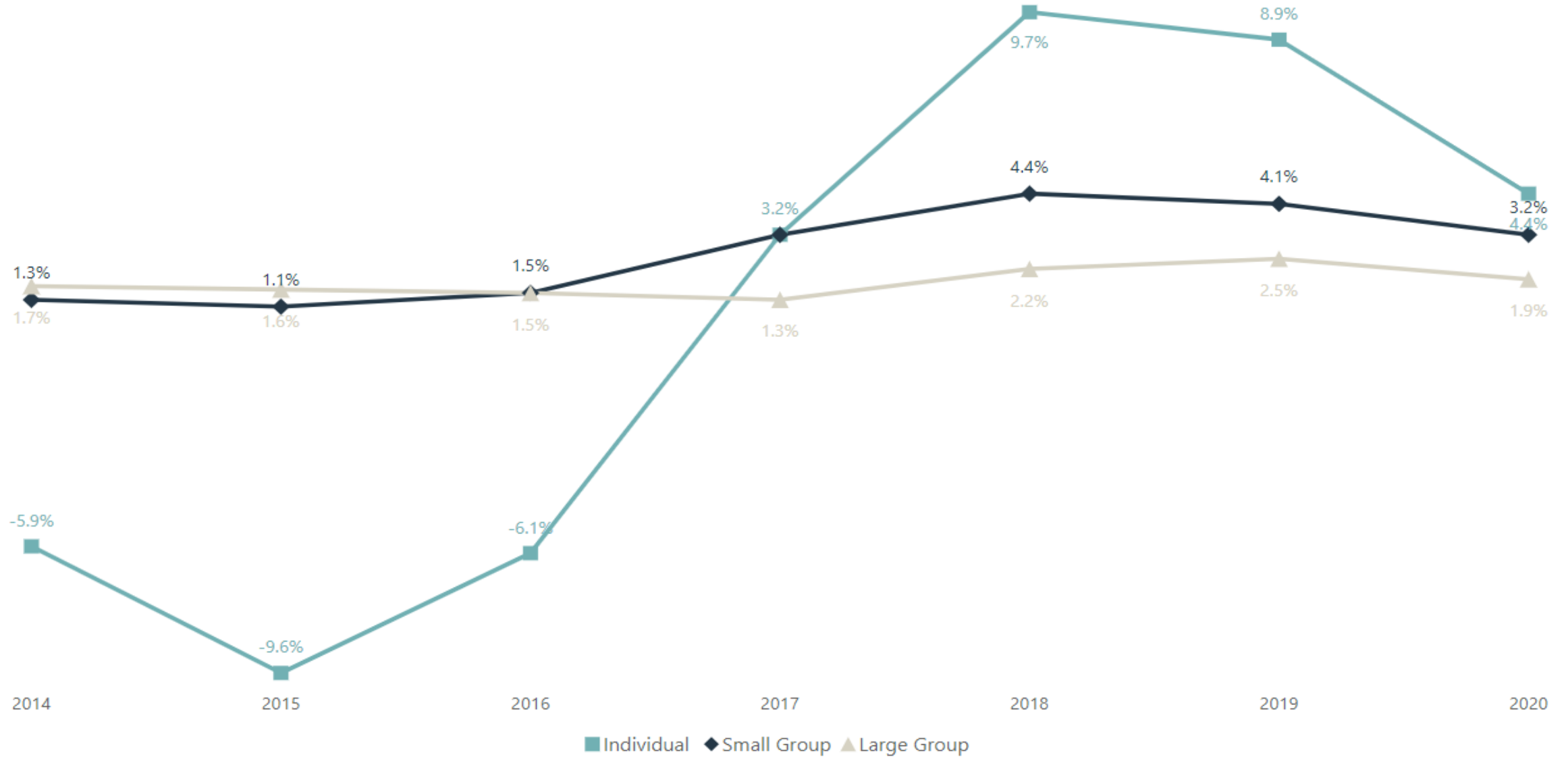


Average Administrative Expenses (% of Earned Premium)

Average Administrative Expenses (% of Earned Premium)

● CAE & GA ● Quality Improvement

## UNDERWRITING MARGIN, 2014 THROUGH 2020





# Future market direction

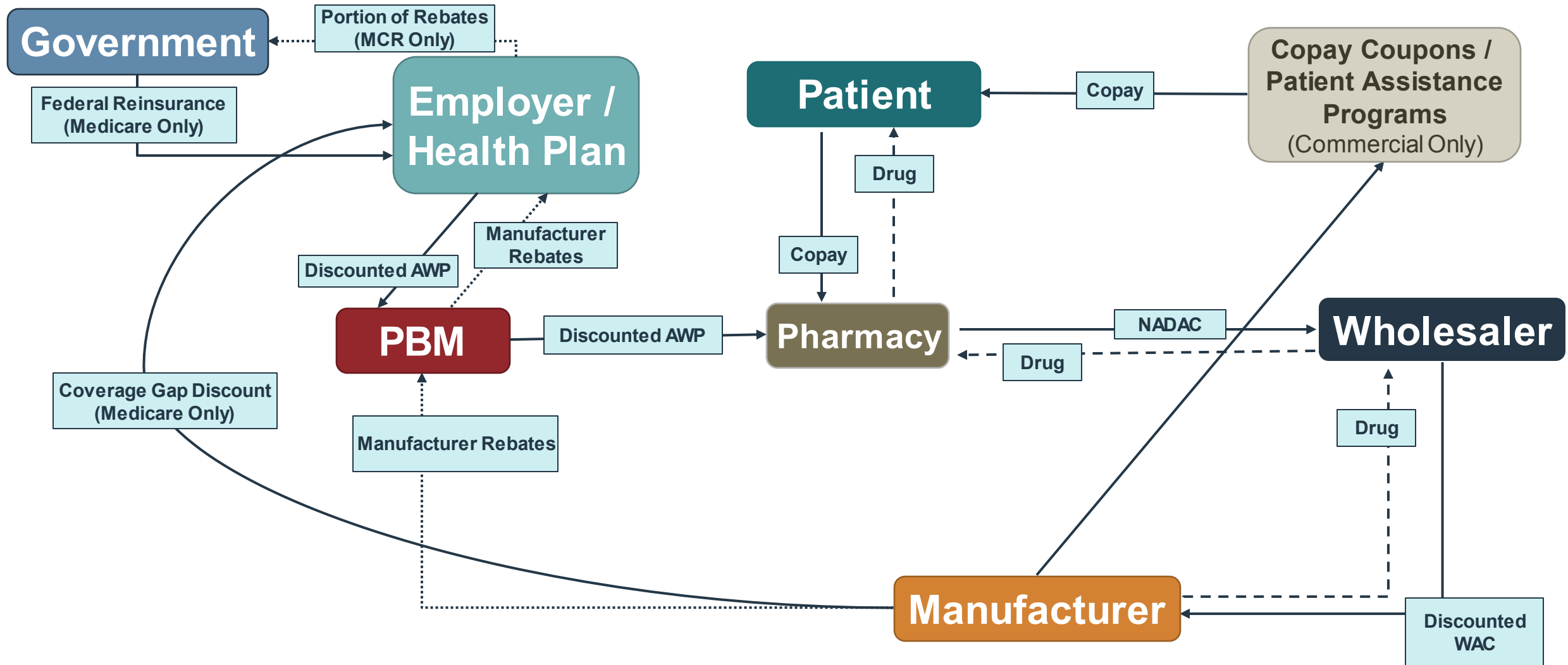
- Insurers will have to adapt and embrace change since change is constant
- Premiums in the ACA market seem to have stabilized since 2019
- Increasingly aggressive fee schedule negotiations for ACA products. Price transparency rules will likely accelerate that trend
- Health insurance markets remain fundamentally local

# **The prescription drug market:** Stakeholder strategies and how the Inflation Reduction Act impacts them

# Who are the stakeholders/players?

- **Patient**
- **Employer/health plan (commercial, self-insured employer, Medicare Part D, etc.)**
- **Pharmacy**
- **Drug manufacturer**
  - Discovers, develops, and markets prescription drugs.
  - Major manufacturers include GlaxoSmithKline, Novartis, Pfizer, Sanofi, AbbVie, Merck, Bayer, Eli Lilly, and Boehringer
- **Pharmacy Benefit Manager (PBM)**
  - Third party administrator of prescription drug programs.
  - Develops and maintains the formulary, contracts with pharmacies, negotiates discounts and rebates with drug manufacturers, and processes and pays prescription drug claims. Major PBMs include Express Scripts, CVS Health, OptumRx
- **Government**
- **Drug wholesale companies**
  - Provides drug distribution for a line of brand name and generic pharmaceuticals to a variety of health care providers including acute care hospitals, independent and chain retail pharmacies and other alternate site facilities.

# “Simplified” flow of goods and money



# Incentives in Part D are distorted

## Illustrative Example of why rebates are better than discounts

|   | Drug A (\$2,000) = Higher Discount |                 | Drug B (\$4,000) = Higher Rebate |                  |
|---|------------------------------------|-----------------|----------------------------------|------------------|
|   | % of Allowed                       | Cost per Script | % of Allowed                     | Cost per Script  |
| Discount AWP (Allowed)                        |                                    | \$2,000         |                                  | \$4,000          |
| Manufacturer Rebates                          | 20%                                | <u>(\$400)</u>  | 60%                              | <u>(\$2,400)</u> |
| <b>Net Manufacturer Revenue</b>               | <b>80%</b>                         | <b>\$1,600</b>  | <b>40%</b>                       | <b>\$1,600</b>   |
| Plan Paid (Gross Plan Liability)              | 40%                                | \$800           | 40%                              | \$1,600          |
| Manufacturer Rebates<br>(Plan Retained ~60%)  | 60% * 20% = 12%                    | <u>(\$240)</u>  | 60% * 60% = 36%                  | <u>(\$1,440)</u> |
| <b>Net Plan Liability</b>                     | <b>28%</b>                         | <b>\$560</b>    | <b>4%</b>                        | <b>\$160</b>     |
| Federal Reinsurance                           | 35%                                | \$700           | 35%                              | \$1,400          |
| Manufacturer Rebates<br>(Gov't Retained ~40%) | 40% * 20% = 8%                     | <u>(\$160)</u>  | 40% * 60% = 24%                  | <u>(\$960)</u>   |
| <b>Net Government Cost</b>                    | <b>27%</b>                         | <b>\$540</b>    | <b>11%</b>                       | <b>\$440</b>     |
| <b>Patient Cost Sharing</b>                   | <b>25%</b>                         | <b>\$500</b>    | <b>25%</b>                       | <b>\$1,000</b>   |

Same revenue for manufacturer

Plan liability decreases

Patient pays more

# Changes from the Inflation Reduction Act

**The Inflation Reduction Act (IRA) was signed into law on August 16, 2022**

Key changes to the Medicare and Part D programs:

1. Drug price negotiation
2. Drug inflation rebates
3. Part D benefit redesign

# IRA: Drug Price Negotiation

**Gives the HHS Secretary the ability to negotiate a subset of Part D and Part B drugs, provided they meet certain criteria, e.g., high-spend and a certain number of years since FDA approval. Effective 2026 for Part D, 2028 for Part B drugs.**

- Drugs from the top 50 highest spend single source Part B drugs, the 50 high spend single-source brand-name Part D drugs, and single-source insulins would be eligible
- A list of up to 10 drugs would be negotiable in 2026, with an additional 15 drugs each year in 2027-2028, and an additional 20 drugs each year in 2029 and beyond
- The legislation provides guardrails for the price negotiation (drugs < 7 years from FDA-approval are exempt), indicating the minimum discount would be:
  - **25%** for a short-monopoly drug (< 12 years since launch)
  - **35%** for post-exclusivity drug (12 - 16 years since launch)
  - **60%** for a long-monopoly drug (> 16 years since launch)
  - OR the weighted average negotiated price net of all price concessions from prior year
- Manufacturers would pay a penalty equal to 10 times the amount charged above the negotiated price for not providing eligible entities the maximum fair price during a period of agreement
  - Manufacturers that decline negotiation for a selected drug will pay a variable tax of 2x to 19x daily sales

# Drugs likely subject to price negotiation

| Spending Rank | Drug Name       | Manufacturer                  | 2020 Total Medicare Part D Spend <sup>1</sup> | First Approval Date <sup>2</sup> | Years Since Drug Launch (as of 1/1/2026) |
|---------------|-----------------|-------------------------------|---|----------------------------------|--|
| 1             | Eliquis         | Bristol-Myers Squibb / Pfizer | \$9.94 billion                                | Dec. 2012                        | 13                                       |
| 2             | Revlimid        | Celgene/BMS                   | \$5.36 billion                                | Dec. 2005                        | 20                                       |
| 3             | Xarelto         | Janssen Pharm.                | \$4.70 billion                                | July 2011                        | 14                                       |
| 4             | Januvia         | Merck Sharp & D               | \$3.87 billion                                | Oct. 2006                        | 19                                       |
| 5             | Trulicity       | Eli Lilly & Co.               | \$3.28 billion                                | Oct. 2006                        | 19                                       |
| 6             | Imbruvica       | AbbVie Inc.                   | \$2.96 billion                                | Sept. 2014                       | 11                                       |
| 7             | Lantus Solostar | Sanofi-Aventis                | \$2.66 billion                                | April 2000                       | 25                                       |
| 8             | Jardiance       | Boehringer Ing.               | \$2.38 billion                                | August 2014                      | 11                                       |
| 9             | Humira(Cf) Pen  | AbbVie Inc.                   | \$2.17 billion                                | Dec. 2002                        | 23                                       |
| 10            | Ibrance         | Pfizer US Pharm               | \$2.11 billion                                | Feb. 2015                        | 10                                       |
| 11            | Symbicort       | Astrazeneca                   | \$1.98 billion                                | July 2006                        | 19                                       |
| 12            | Xtandi          | Astellas Pharma               | \$1.97 billion                                | August 2012                      | 13                                       |
| 13            | Novolog Flexpen | Novo Nordisk                  | \$1.84 billion                                | August 2012                      | 13                                       |
| 14            | Biktarvy        | Gilead Sciences               | \$1.78 billion                                | June 2000                        | 25                                       |
| 15            | Myrbetriq       | Astellas Pharma               | \$1.75 billion                                | June 2012                        | 13                                       |

<sup>1</sup> Medicare Part D 2020 Spending Dashboard <https://data.cms.gov/summary-statistics-on-use-and-payments/medicare-medicaid-spending-by-drug/medicare-part-d-spending-by-drug>

<sup>2</sup> Drugs.com Approval History

The Medicare Part D Dashboard does not aggregate similar brands across all administration types (e.g. Novolog (vial form) and Novolog Flexpen are listed separately)

**No shading indicates short monopoly drugs** (<12 yrs, 25% minimum discount of non-federal average manufacturer price)

**Orange shading indicates extended monopoly drugs** (12-16 yrs, 35% minimum discount of non-federal average manufacturer price)

**Red shading indicates long monopoly drugs** (16+ yrs, 60% minimum discount of non-federal average manufacturer price)



# IRA: Drug inflation rebates

**Requires rebates to be paid by manufacturers in cases when single-source brand and biologic drug prices increase faster than inflation. Effective October 2022 for Part D drugs, January 2023 for Part B drugs.**

- Manufacturers must pay inflation rebates on single source brand and biologic drugs in both the **Medicare and commercial markets** if prices increase at a faster rate than inflation
- Drug inflation would be benchmarked relative to prices on October 1, 2021 and trended forward at Consumer Price Index for all Urban consumers (CPI-U)
  - Excess price increases of the CPI-U changes would be paid as an inflation rebate
- Part B member coinsurance would be based on inflation-adjusted prices
- Inflation rebates paid directly to the Part B / D trust fund

# IRA: Part D benefit redesign

**Restructures the Part D benefit design including the amount paid by beneficiaries, federal government, and drug manufacturers. Effective 1/1/2025.**

- **Changes for Beneficiaries:**

- Sets a maximum out-of-pocket (MOOP) of \$2,000 and eliminates the coverage gap
- Defined standard member cost-sharing remains at 25% between the deductible and MOOP
- Also includes a smoothing option for users with cost sharing expected to reach the MOOP before the end of the year

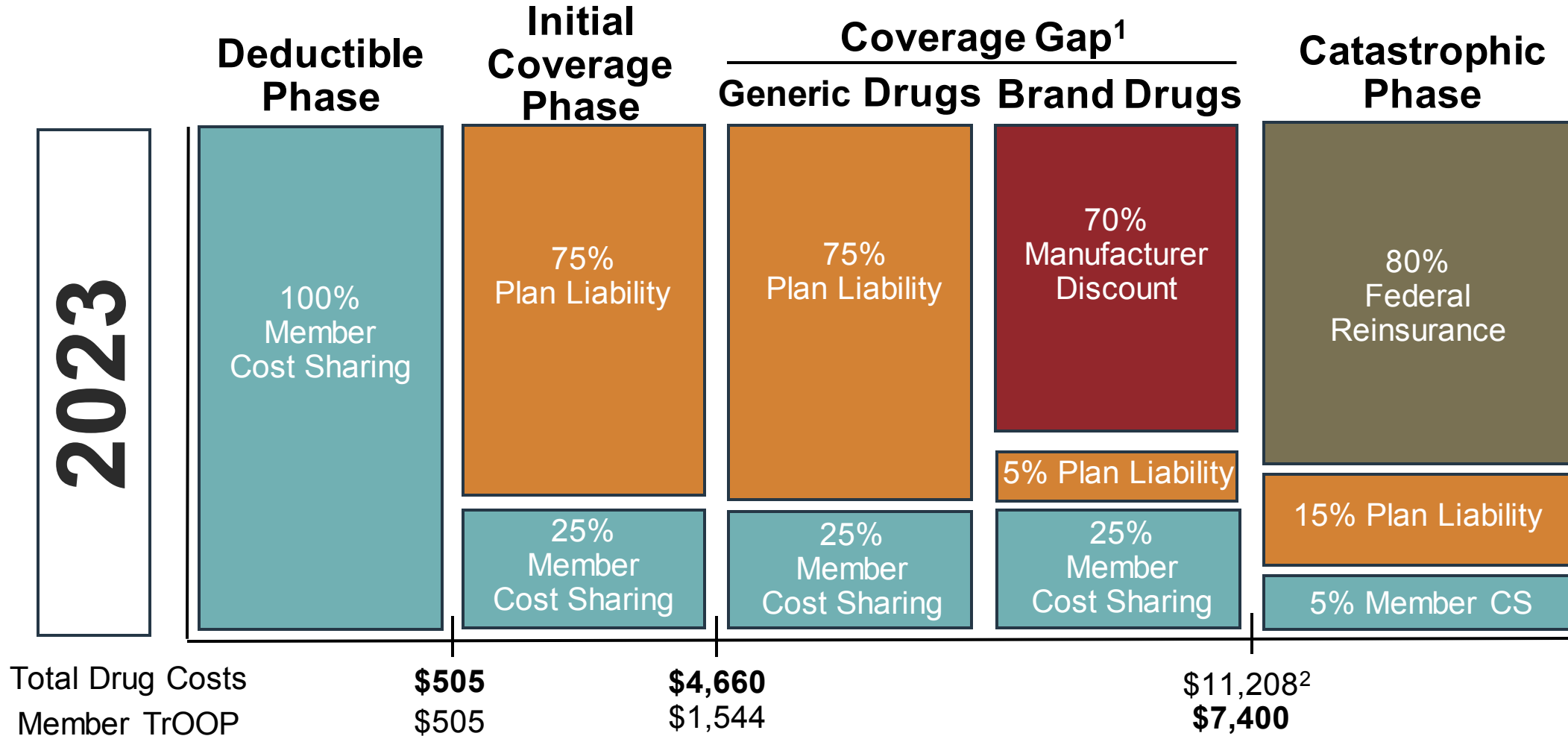
- **Change for Government:**

- Federal reinsurance decreases from 80% for all drugs to 20% for applicable drugs and 40% for non-applicable drugs

- **Changes for Pharmaceutical Manufacturers:**

- New pharmaceutical manufacturer discount program that reflects 10% of applicable drug costs above deductible and below the MOOP, and 20% of drug costs above the MOOP
- New pharmaceutical manufacturer discount program would not apply to drugs selected for price negotiation.
- Spending from low-income beneficiaries would now be eligible for manufacturer discount program with a phase in for small manufacturers (80% of their portfolios' Part D expenditures from a single drug).

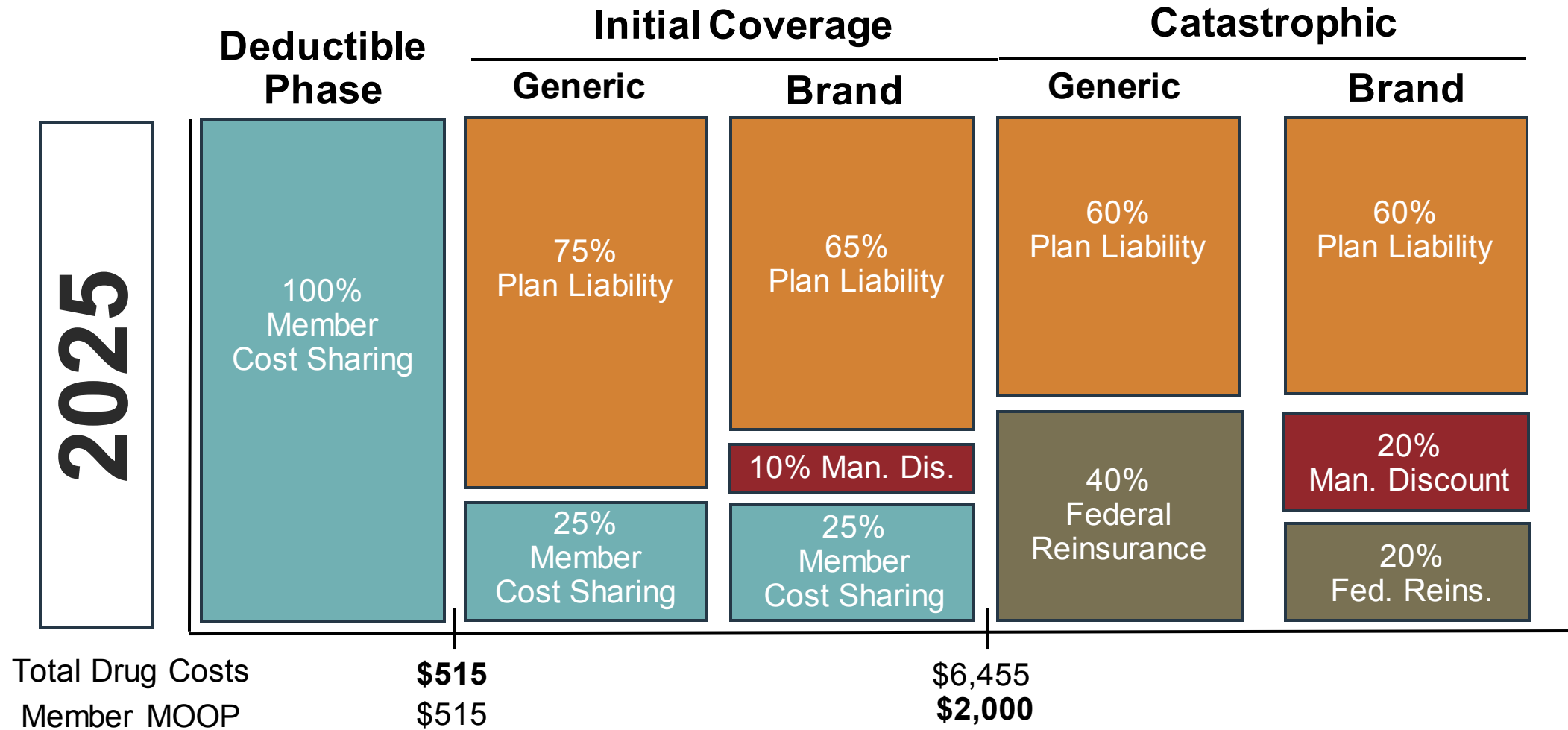
# Medicare Part D Defined Standard Plan Design 2023



<sup>1</sup> Both member and manufacturer liability accumulate toward True Out-of-Pocket (TrOOP)

<sup>2</sup> Estimated catastrophic coverage limit corresponding to True Out-of-Pocket (TrOOP) spending of \$7,400 (~92% of spend = brand)

# Medicare Part D IRA Plan Design 2025



# How does IRA affect all stakeholders

- **Patients / Beneficiaries:**

- Lower drug prices and smaller drug price increases leads to lower cost sharing
- Implementation of a \$2,000 MOOP for Medicare beneficiaries greatly reduces cost sharing for patients using high-cost drugs
- The impact on Part D member premium is unknown but should come down in the long run

- **Employer / Health Plan, PBM:**

- High-priced drugs with high rebates will lose leverage to drugs with high price discounts

- **Pharmaceutical Manufacturers:**

- The new pharmaceutical manufacturer discount program will have a varied impact on different drugs based on their price but overall the amount collected will be greater than the previous coverage gap discount program amounts
- Price negotiation will decrease manufacturers' revenues **significantly** but some of it can be offset by the removal of manufacturer discount and by lowering their rebates

- **Federal Government:**

- Low-income cost sharing subsidies and the federal reinsurance amount will decrease under the new plan design
- There will be an increase to the Part D direct subsidy to offset reinsurance and cost sharing increases
  - *The **Part D direct subsidy** is a capitated payment to plans calculated as a share of the adjusted national average of plan bids.*

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# Thank you.

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