Methodology for Selecting Prescription Drugs for Affordability Review

Purpose

This policy establishes the methodology for how the Washington State Prescription Drug Affordability Board (PDAB) will:

- Select data measures for evaluating prescription drugs on the list prescription drugs eligible for affordability review;
- Review and utilize data measures to measure and rank prescription drugs; and
- Create criteria to nominate, vote, and approve prescription drugs for the affordability review.

Background

Staff prepared and presented to the Board a list of eligible prescription drugs that met the criteria set forth in section 70.405.030 RCW to be considered by the Board for an affordability review.

Section 70.405.030 RCW requires that the Board annually identify prescription drugs that have been on the market for at least seven years, are dispensed at a retail, specialty, or mail-order pharmacy, are not designated by the United States food and drug administration under 21 U.S.C. Sec. 360bb as a drug solely for the treatment of a rare disease or condition, and meet the following thresholds:

- (1) Brand name prescription drugs and biologic products that:
- (a) Have a wholesale acquisition cost of \$60,000 or more per year or course of treatment lasting less than one year; or
- (b) Have a price increase of 15 percent or more in any 12-month period or for a course of treatment lasting less than 12 months, or a 50 percent cumulative increase over three years;
- (2) A biosimilar product with an initial wholesale acquisition cost that is not at least 15 percent lower than the reference biological product; and
- (3) Generic drugs with a wholesale acquisition cost of \$100 or more for a 30-day supply or less that has increased in price by 200 percent or more in the preceding 12 months. [2022 c 153 § 3.]

From the list of eligible prescription drugs, in accordance with section 70.405.040 RCW, the Board may select up to 24 prescription drugs for affordability review per year. In determining whether to conduct an affordability review for each identified prescription drug, the Board must consider:

- The class of the prescription drug and whether any therapeutically equivalent prescription drugs are available for sale;
- Input from relevant advisory groups established pursuant to RCW 70.405.020; and
- The average patient's out-of-pocket cost for the drug.

Choosing the Selection Criteria

In addition to considering the required selection criteria set forth in section 70.405.040 RCW, each board member met with PDAB staff and set forth additional selection criteria they thought as important when deciding whether to select a prescription drug for affordability review. The final 12 proposed and required selection criteria from 70.405.040 RCW were:

- 1. Total plan paid amount
- 2. Total out-of-pocket cost
- 3. Total paid amount
- 4. Average plan paid amount
- 5. Average out-of-pocket cost
- 6. Average paid amount
- 7. Patient liability proportion
- 8. Total number of people using the prescription drug
- 9. Therapeutic equivalent availability
- 10. Generic availability
- 11. If the drug meets multiple thresholds of the legislative definition
- 12. Input from the Washington State PDAB advisory group

Data Sources

Washington State All Payer Claims Database (WA-APCD)

The APCD is Washington State's most complete source of health and dental insurance data, representing about 70% of the state's population, or over 5 million people. All health carriers in Washington State are required to report their data to the APCD, as well as state Medicaid plans, public employee benefit plans (PEBB), school employee benefit plans (SEBB), third party administrators, and the Washington State labor and industries program. Self-insured plans submit data to the APCD on a voluntary basis.

First Databank (FDB) and Medi-Span

FDB and Medi-Span are commercial databases containing drug pricing and clinical information for drugs approved by the US Food and Drug Administration (FDA).

Proposed Selection Criteria Definitions & Methodologies

For each prescription drug in the list of eligible prescription drugs for affordability review, the Board was presented with:

- The prescription drug's label name,
- Ingredient name,
- Dosage form,
- Drug strength,
- Therapeutic class,
- Which section 70.405.030 RCW requirement it met,
- The qualifying section 70.405.030 RCW results, and
- 11 proposed and mandatory selection criteria (minus input from the Washington State PDAB advisory group, which is yet to be collected) detailed below in the following format:

Criterion	Definition	Data Field	Data Source	Methodology	Criterion Type
Name of criterion	An	The type of	The data	The formula or	Whether the
	explanation	data the	source Staff	calculation	criterion is
	of the	selection	used to	used to obtain	quantifiable
	selection	criterion	calculate	the selection	(numeric data
	criterion	provides,	the	criterion	that can be
		i.e. a	selection	result	measured) or not
		number, a	criterion		quantifiable
		dollar			(data that cannot
		amount, a			be measured or
		text field			expressed as
					numeric data)

Proposed Selection Criteria

Criterion	Definition	Data	Data	Methodology	Criterion Type
		Field	Source		
Total plan paid	Dollar amount	Dollar	WA-APCD	Sum of the dollar	Quantifiable
amount	showing what	amount		amount paid to	
	health plans			the provider by	
	paid for each			the health plan	
	prescription			for the	
	drug within one			prescription drug	
	year			in calendar year	
	your			2022	

				Formula: Total copay amount + Total coinsurance amount + Total deductible amount	
Total out-of-	Dollar amount	Dollar	WA-APCD	Sum of total	Quantifiable
pocket cost	showing patient paid amounts for the prescription drug. Patient paid amounts include deductibles, coinsurance, and copayments within one year.	amount		copay, coinsurance, and deductible amounts paid by patients for the prescription drug in calendar year 2022. Formula: Total copay amount + Total coinsurance amount + Total deductible amount	
Total paid amount	Dollar amount showing the total amount paid by health plans and patients for each prescription drug within one year.	Dollar amount	WA-APCD	Total amount paid, or allowed amount, by the health plan and patients for the prescription drug in calendar year 2022 Formula: Total out-of-pocket cost + Total plan paid amount	Quantifiable
Average annual plan paid amount	Dollar amount per person per year showing	Dollar amount	WA-APCD	Sum of the dollar amount paid to the provider by	Quantifiable

	the total amount paid by health plans for the prescription drug divided by the number of patients who had a claim for that drug within one year			health plans for the prescription drug in calendar year 2022 divided by the number of patients who had a claim for the prescription drug in calendar year 2022. Formula: Total plan paid amount/Number of people using the prescription drug	
Average annual out-of-pocket cost	Dollar amount showing an annual cost of the patient paid amounts per person per year for the prescription drug divided by the number of patients who had a claim for that drug within one year	Dollar	WA-APCD	Sum of total copay, coinsurance, and deductible amounts for the prescription drug in calendar year 2022 divided by the number of patients who had a claim for the prescription drug in calendar year 2022. Formula: Total out-of-pocket cost/Number of people using the prescription drug	Quantifiable

Average annual	Dollar amount	Dollar	WA-APCD	Sum of the total	Quantifiable
paid amount	per person per	amount		amount paid by	
	year showing			health plan and	
	the total			patients for each	
	amount paid by			prescription drug	
	health plans			in calendar year	
	and patients for			2022 divided by	
	each			the number of	
	prescription			patients who	
	drug divided by			had a claim for	
	the number of			the prescription	
	patients who			drug in calendar	
	had a claim for			year 2022.	
	that drug within				
	one year.			Formula: Total	
				paid amount/Number	
				of people using the prescription	
				drug	
				urug	
Patient liability	A proportion	Number	WA-APCD	Average out-of-	Quantifiable
proportion	showing the			pocket cost in	
	share of the			calendar year	
	total amount			2022 divided by	
	that a patient			average paid	
	pays towards			amount in	
	the total			calendar year	
	amount paid by			2022	
	health plans				
	and patients for			Formula:	
	each			Average annual	
	prescription			out-of-pocket	
	drug within one			cost/Average annual paid	
	year			amount	
Total number of	The number of	Number	WA-APCD	The count of	Quantifiable
people using the	patients who	Number		distinct patients	Quantinable
prescription drug	had a claim for			who had a claim	
	the prescription			for the	
		<u> </u>			<u> </u>

	drug within one			prescription drug	
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	,			_	
Therapeutic equivalent availability	The prescription drug has a therapeutic equivalent, according to the definition of therapeutic equivalent in section 69.41.110 RCW: "Therapeutically equivalent" means a drug product of the identical base or salt as the specific drug product prescribed with essentially the same efficacy and toxicity when administered to an individual in the same dosage regimen.	Text (Yes/No)	First Databank (FDB)	in calendar year 2022. Retrieve a list of therapeutically equivalent products from the FDB, whose data is based on the FDA Orange Book. Based on the definition of therapeutic equivalent in section 69.41.110 RCW, a practitioner may substitute a drug with a "therapeutically equivalent" drug product or "interchangeable biological" drug product. When reviewing prescription drug data, the Board will consider any biologic with a biosimilar (interchangeable or not) as having a therapeutic equivalent. Biosimilar products and	Not quantifiable
				products and corresponding	

				reference	
				biological	
				products are	
				identified	
				utilizing FDB's	
				NDC attribute	
				indicators for	
				linking reference	
				biologic and	
		_		biosimilar NDCs.	
Generic	The brand name	Text	First	Link generic	Not
availability	prescription	(Yes/No)	Databank	prescription	quantifiable
	drug has an		(FDB), Medi-Span	drugs to their	
	FDA-approved		Tical opan	brand	
	drug that is			counterparts	
	chemically identical or			utilizing their	
				shared unique clinical	
	bioequivalent to the brand name			formulation	
				identifier.	
	drug in dosage form, safety,			identinei.	
	strength, route				
	of				
	administration,				
	quality,				
	performance				
	characteristics,				
	and intended				
	use.				
	400.				
If the drug meets	Whether the	Number	List of	The prescription	Not
multiple	prescription		eligible	drug meets	quantifiable
thresholds of the	drug meets		prescription	multiple	
legislative	multiple		drugs for	selection criteria	
definition	selection		affordability	set forth in	
	criteria set forth		review	section	
	in section			70.405.030 RCW	
	70.405.030				
	RCW				

Input from the	The Washington	Text	Washington	Feedback will be	Not
-		IOAC			
Washington state	state PDAB		state PDAB	collected from	quantifiable
PDAB advisory	advisory group		advisory	Washington	
group (yet to be	will view the		group	state PDAB	
collected)	prescription		members	advisory group	
	drugs on the			members	
	affordability				
	review shortlist				
	and give				
	feedback on				
	what				
	prescription				
	drugs should be				
	selected for				
	review.				

Exclusions

Prescription drugs with no claims in the WA-APCD in calendar year 2022 were excluded from affordability review eligibility.

Narrowing Down the Selection Criteria

The Board considered and discussed the 12 proposed and required selection criteria set forth in section 70.405.040 RCW and chose six criteria they thought as the most important when selecting prescription drugs for affordability review:

- Total number of people using the prescription drug
- Average out-of-pocket cost
- Total out-of-pocket cost
- Total paid amount
- Therapeutic equivalent or generic availability
- If the drug meets multiple thresholds of the legislative definition

Applying the Selection Criteria

The Board and Staff worked together to develop a two-step approach of a points exercise conducted by the Board to weight the quantifiable data measures and ranking the data measures to prioritize the four quantifiable selection criteria chosen by the Board and to

maximize the utilization of the data provided by each criterion when selecting prescription drugs for affordability review. The two remaining non-quantifiable selection criteria will be reviewed by the Board once the affordability review shortlist is created.

Weighting

Each of the five board members received 20 points (totaling 100 points) to distribute among the following four quantifiable selection criteria below. The more points distributed to a criterion by a board member, the more important the criterion is to the board member when selecting prescription drugs for affordability review.

- Total number of people using the prescription drug
- Average out-of-pocket cost
- Total out-of-pocket cost
- Total paid amount

The two remaining selection criteria are non-quantifiable text data fields and cannot be ranked in the second step of the process and are therefore excluded from the weighting process:

- Therapeutic equivalent or generic availability and,
- If the drug meets multiple thresholds of the legislative definition

These two non-quantifiable selection criteria will be reviewed by the Board for the prescription drugs placed on the affordability review shortlists, two lists of the top 25 specialty and non-specialty prescription drugs with the lowest weighted rank that will be created after the completion of the ranking and weighting process. Similarly, Washington state PDAB Advisory Group input will be collected after the affordability review shortlists are created.

Ranking

While the Board allocated their points, Staff separated the eligible prescription drugs into specialty and non-specialty prescription drugs. Specialty prescription drugs were defined as medications that require special storage, handling, administration, or monitoring. Biologic and biosimilar prescription drugs were categorized as specialty drugs, except those that were reclassified as biologics under the Biologics Price Competition and Innovation (BPCI) Act. Brand and generic prescription drugs were considered non-specialty drugs. Of the 294 prescription drugs eligible for affordability review, 59 were categorized as specialty drugs, and 235 were categorized as non-specialty drugs.

For each specialty and non-specialty prescription drug list, Staff sorted each of the four quantifiable selection criteria in descending order and assigned rankings. For example, the total paid amount was sorted from highest to lowest with the highest total paid amount

given the rank of one, the second highest total paid amount given the rank of two, and so forth. This process was repeated for the other three criteria.

For tied rankings, the average ranking was assigned to each tied rank. For the example below, since drugs C and D had the same total paid amount and were ranked in positions 3 and 4, their final points rank is the average of their rankings: (3+4)/2=3.5.

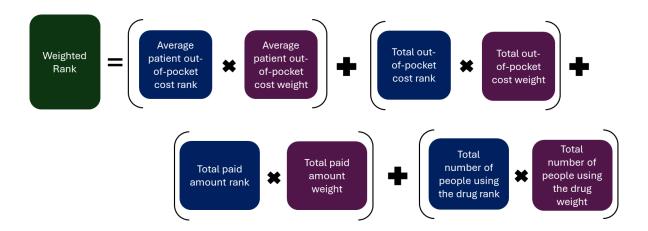
Drug	Total Paid Amount	Total Paid Amount	
		Rank	
Α	\$4	1.0	
В	\$7	2.0	
С	\$12	3.5	
D	\$12	3.5	
E	\$19	5	

Calculating Weighted Rank

Board members' point allocation results (see table below) were collected and their assigned points for each selection criterion totaled.

Then, the following steps were taken:

- 1. The weights for each selection criterion were created by dividing the total points assigned to each criterion by the total amount of points (100) assigned to the Board.
- 2. A weighted rank was obtained for each prescription drug by summing the ranking for each selection criterion multiplied by their corresponding weights created in step 1.



Board member point allocation results:

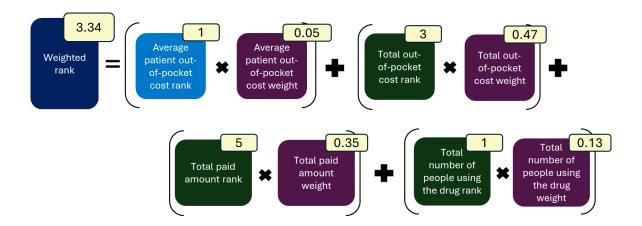
Board Member	Average Out-of- Pocket Cost	Total Out- of-Pocket Cost	Total Paid Amount	Total Number of People Using the Drug	Total
1	0	15	0	5	20
2	5	7	5	3	20
3	0	5	10	5	20
4	0	10	10	0	20
5	0	10	10	0	20
Total	5	47	35	13	100
Weight (Total/100)	0.05	0.47	0.35	0.13	

Example weighted rank calculation:

Suppose a prescription drug has the ranks below for each selection criteria. Note that out-of-pocket cost is abbreviated as OOP.

	Drug	Average OOP Cost	Average OOP Cost Rank	Total OOP Cost	Total OOP Cost Rank	Total Paid Amount	Total Paid Amount Rank	Total # of People Using the Drug	Total # of People Using the Drug Rank
A	4	\$427	1	\$5,000	3	\$10,000	5	356	1

The weighted rank for this prescription drug would be calculated by multiplying the ranks for each selection criteria by their weights and adding them together:



Creating the Prioritized Shortlist

The specialty and non-specialty prescription drug lists were sorted from lowest to highest by weighted rank, and the top 25 prescription drugs with the lowest weighted ranks in each list were used create two shortlists of specialty and non-specialty prescription drugs for the Board and Washington State PDAB advisory group to study and select prescription drugs for affordability review.