



MEMORANDUM

July 18, 2022

To: WCD's Medical Advisory Committee

From: Donald P Gallogly and Juerg Kunz

Subject: Bulletin 361 Drugs

Bulletin 361 requires physicians to file a clinical justification form when prescribing one of seven brand-name pharmaceuticals. Its purpose is to encourage providers to consider generic substitutes to brand-name drugs. Prior to its implementation, several methods for selecting drugs to include in the bulletin were considered. Among them were the overall rank of the drug in terms of payments, the cost per dose and per service, the growth rate of the drugs in recent years, and the cost of the brand-name relative to its generic equivalent. Ultimately, the seven drugs that were chosen were those that had a large volume of total payments and also a high number of services annually, figuring that this was where the largest impact could be realized.

The seven drugs chosen were Oxycontin, Lyrica, Lidoderm, Cymbalta, Celebrex, Kadian and Fentora. These seven were determined to be heavily prescribed cost drivers when Bulletin 361 was effected. This memo addresses the payment trends for these pharmaceuticals over the past 10 years and presents a list of the current top-20 brand-name drugs for consideration for inclusion on the list.

Figure 1 shows the total payments reported in each year for each of the drugs listed in Bulletin 361. For each drug, the leftmost column shows total payments for 2011, the years increase moving to the right, and the rightmost column in each group shows 2021 payments. All the listed drugs showed significant declines in payments over the period. There were no payments for Fentora later than 2012.

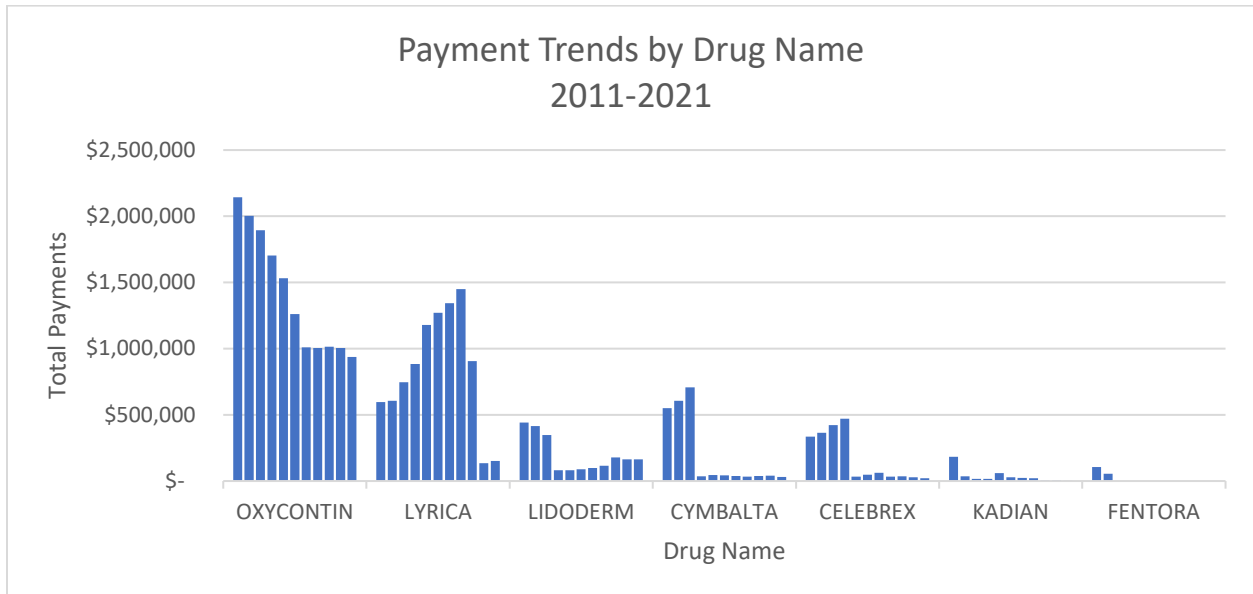


Figure 1

Figure 2 shows the number of services (dispenses) for the listed drugs over the period from 2011 to 2021. Although the number of doses per service or dispense can vary, a change in the frequency of dispenses can be an indicator of changes in prescribing patterns. As shown in figure 2, all drugs declined in frequency as well as in volume of payments.

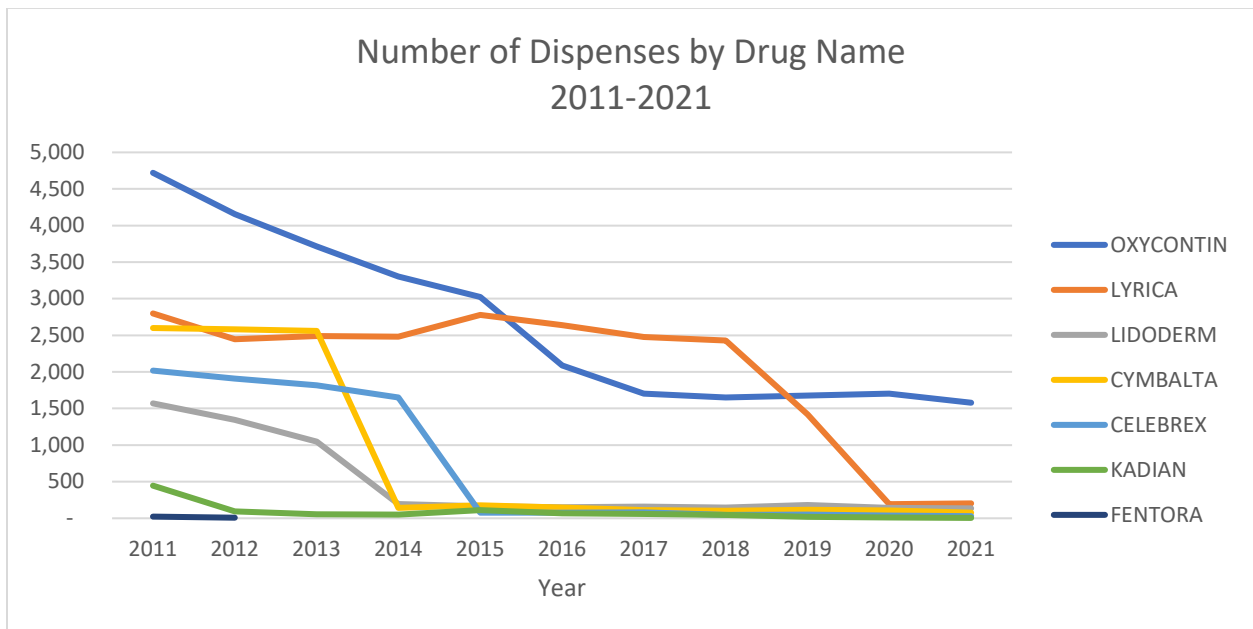


Figure 2

Table 1 shows the rank of the drugs listed on Bulletin 361 among all brand name drugs with payments from WC insurers for prescriptions in that year. In 2011, all the drugs were among

those with highest payment volume. In 2021, Oxycontin was still the number 1 drug by payments, and others, specifically Lyrica and Lidoderm, have mostly held their positions in the ranking despite decreasing in frequency. However, several others have shown significant declines in payment volume relative to other brand name drugs. In the same period, the total number of brand-name drugs prescribed within the WC system has declined by 18.5 percent.

Rank Among Brands by Total Payments							
Payment Year	OXYCONTIN	LYRICA	LIDODERM	CYMBALTA	CELEBREX	KADIAN	FENTORA
2011	1	2	4	3	5	7	12
2012	1	3	4	2	5	30	22
2013	1	2	5	3	4	60	
2014	1	2	10	33	3	57	
2015	1	2	11	30	40	20	
2016	2	1	13	30	26	49	
2017	2	1	12	38	21	49	
2018	2	1	7	34	35	52	
2019	1	2	4	26	30	104	
2020	1	4	3	33	44	127	
2021	1	4	3	39	51	159	

Table 1

Finally, table 2 shows the top 20 brand name drugs by total payments in the most recent year for which data are complete. Oxycontin, Lidoderm and Lyrica are all still among them for 2021. Several of the others are low-frequency, high-cost pharmaceuticals, that are sometimes new to the market or without generic substitutes. Others are prescribed more commonly and have available alternatives. Revlimid is a cancer drug. Botox is a neurotoxin. Xarelto is an anticoagulant. Isentress is an antiretroviral medication. Horizant is an anti-convulsant of the gabapentoid class. Eliquis is an anticoagulant medication. Somatuline Depot is a medication used in the management of acromegaly and symptoms caused by neuroendocrine tumors.

Rank	Drug Name	Number of Services	Total Payments	Payment per Service
1	OXYCONTIN	1579	\$ 937,310	\$ 594
2	REVLIMID	14	\$ 227,042	\$ 16,217
3	LIDODERM	136	\$ 164,763	\$ 1,211
4	LYRICA	203	\$ 151,800	\$ 748
5	BOTOX	114	\$ 146,886	\$ 1,288
6	XARELTO	219	\$ 129,590	\$ 592
7	ISENTRESS	109	\$ 124,264	\$ 1,140
8	HORIZANT	140	\$ 114,581	\$ 818
9	ELIQUIS	198	\$ 113,651	\$ 574
10	SOMATULINE DEPOT	12	\$ 110,044	\$ 9,170
11	TIBSOVO	4	\$ 109,669	\$ 27,417
12	PERCOCET	59	\$ 96,798	\$ 1,641
13	MACI	2	\$ 90,615	\$ 45,307
14	PRIALT	11	\$ 88,800	\$ 8,073
15	GRALISE	100	\$ 78,994	\$ 790
16	VIMPAT	58	\$ 63,912	\$ 1,102
17	NUCYNTA	92	\$ 63,445	\$ 690
18	SIMPONI	12	\$ 62,462	\$ 5,205
19	COSENTYX SENSOREADY PEN	11	\$ 60,657	\$ 5,514
20	FORTEO	4	\$ 60,572	\$ 15,143

Table 2