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March 24, 2022

Rep. Tina Liebling  
Chair, Health Finance and Policy Committee  
100 Rev. Dr. Martin Luther King Jr. Blvd  
Saint Paul, MN, 55155

**RE: H.F. 3280 – PBM and Health Carrier Requirements of Clinician-Administered Drugs - Oppose**

Dear Representative Liebling,

I am writing on behalf of America's Health Insurance Plans<sup>i</sup> to provide comments in opposition to House File 3280 (HF 3280) – Pharmacy benefit managers and health carrier requirements of clinician-administered drugs established. AHIP has extensive first-hand and practical knowledge about the nation's health care and health insurance systems and a unique understanding of how those systems work. We appreciate the opportunity to share our expertise in the context of HF 3280.

Approximately three weeks ago Sergio Santiviago, AHIP's Vice President of Drug Policy, testified before a Minnesota legislative committee with significant concerns regarding the mechanics and unintended consequences of HF 3280. Despite the newly proposed amendment, AHIP still has grave concerns with this legislation.

Even with the new amendment language, HF 3280 will increase the cost of care in a specialty drug market that is one single largest driver in the rise of the cost of care in the entire healthcare marketplace.

Health insurance providers have diligently and successfully brought down premium costs historically while increasing the variety of plans offered across Minnesota. AHIP supports steps to encourage a competitive marketplace that supports health insurance providers' ability to reduce premiums for consumers while providing high-quality care. It is important to avoid policies that remove existing tools health insurance providers use to encourage lower cost, higher quality, and more convenient drug administration.

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We thank you for considering our concerns regarding this issue. If you have any questions, please do not hesitate to contact me at (202) 400-0928 or [jkeepes@ahip.org](mailto:jkeepes@ahip.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Joshua D. Keepes". The signature is fluid and cursive, with the first and last names being more prominent.

Joshua D. Keepes, J.D.  
America's Health Insurance Plans

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<sup>i</sup> America's Health Insurance Plans (AHIP) is the national association whose members provide insurance coverage for health care and related services. Through these offerings, we improve and protect the health and financial security of consumers, families, businesses, communities and the nation. We are committed to market-based solutions and public-private partnerships that improve affordability, value, access, and well-being for consumers.