March 4, 2026

The Honorable Matt Klein, Chair Commerce and Consumer Protection Committee
The Honorable Judy Seeberger, Vice Chair, Commerce and Consumer Protection Committee
Minnesota Senate Commerce and Consumer Protection Committee Members
Minnesota Senate
Room G-15 Capitol
St. Paul, MN 55155

Re: **SF 2071 – Prohibiting the use of step therapy for insulin drugs – PCMA Opposed**

Dear Chair Klein, Vice Chair Seeberger and Members of the Commerce and Consumer Protection Committee:

The Pharmaceutical Care Management Association (PCMA) is the national association of America's pharmacy benefit managers (PBMs). We appreciate the opportunity to comment on SF 2071.

About PBMs

PBMs are hired by employers, unions, government programs and others to drive down prescription drug costs and administer prescription drug plans for more than 289 million Americans. Before getting into specifics on SF 2071, there are five things to know about PBMs:

- PBMs are the only part of the drug supply chain whose primary role is to lower prescription drug costs. On average, they save patients and families about $1,154 per person each year.
- PBMs are extremely effective at reducing prescription drug costs for employers and patients, which is why some industries that profit from high drug prices oppose them.
- PBMs work for employers, unions, and government programs who have the ultimate say on what a drug benefit looks like. PBMs carry out the chosen plan by negotiating lower drug prices, processing claims, performing safety checks, and handling related services.
- For the enormous savings and value that PBMs provide, they operate on thin profit margins.
- Hiring a PBM is optional. Employers, unions, government programs, and others choose to use PBMs because they help lower drug costs and manage prescription benefits more efficiently.

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About SF 2071

PCMA has significant concerns with SF 2071, which would drive up employer costs and more importantly put patients at risk. Many medications carry serious side effects, the potential for dangerous interactions, or a high risk of misuse. Step therapy processes ensure each patient receives the right medicine at the right time. Step therapy promotes proven, cost-effective care by guiding patients to alternative safe, affordable treatments. SF 2071 would strip away this essential tool that encourages clinically appropriate and cost-effective use.

Step therapy tools used by PBMs are designed by independent medical experts as part of the PBM's Pharmacy & Therapeutics (P&T) Committee. These committees develop evidence-based guidelines for appropriate use of prescription drugs. PBMs take these guidelines and work with insurers to craft health plans with the goal of securing savings and improving health outcomes. These plans also have appeals processes if the patient and their doctor disagree with the guidelines.

Utilization management tools, such as step therapy, are not only just good for patients, they also save money for employers. These safe use and adherence tools can reduce costs by as much as 50%. Over 10 years, increased state-specific costs from restricting these tools could be over $1.3 billion in Minnesota.[1] The US Federal Trade Commission, Government Accountability Office, and National Academy of Medicine all agree—these tools protect patients and help reduce costs[2].

Instead of enacting SF 2071 the legislature should put patients first.

SF 2071 will raise costs and put the safety of patients at risk, without addressing the rising prices set by drug manufacturers. PCMA looks forward to working with members of the committee to address high drug prices while preserving tools that improve affordability and patient safety.

Please feel free to contact me should you have any questions.

Sincerely,



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[1]Visante. 2025. "Increased Costs Associated with Proposed State Legislation Impacting PBM Tools," p. 26.
[2] National Academies of Sciences, Engineering, and Medicine (NASEM). 2017. "Making Medicines Affordable: A National Imperative"