Background
- Wholesale acquisition cost (WAC) is defined as a list price for a drug to wholesalers or direct purchasers and does not include discounts or rebates. 1
- Typically, it does not reflect the actual out of pocket cost patients pay at point of purchase due to negotiations between manufacturers and payers.
- Prescription drug spending was estimated to be $457 billion dollars in 2015. 2

Objective
- To evaluate opinions, concerns, and suggestions to the proposed rule issued by CMS to require DTC television advertisements of prescription drugs and biological products to include the medications’ WAC.

Methods
- On January 2019 comments were analyzed using descriptive statistics for DTC ad-related opinions.
- Proposal opinion □ Fully Supportive □ Supportive with Contingency □ Against □ Demonstration of WAC understanding □ Based on knowledge that WAC is subject to change and not indicative of final out of pocket cost.
- Commenters were categorized based on their backgrounds, for example: □ Healthcare organizations □ Professional medical societies, hospital systems, healthcare representatives, and chain pharmacies □ Nonprofit organizations □ Patient support groups and disease state institutions □ Government or legal representatives □ Government representatives and legal firms □ Unspecified □ Anonymous or lacking identifiers

Results
- 54% expressed concern that patients may confuse WAC with their actual out of pocket cost.
- 48% believed that the proposed rule would promote shared decision making and patient empowerment.
- 37% expressed concern that patients may confuse WAC with their actual out of pocket cost.
- 80% believe that having list price without context may lead to under-treatment or inappropriate prescribing.

Discussion
- The most common suggestion beyond the proposed rule was to develop and refer patients to tools allowing them to access real-time cost information.
- The most common concern expressed was potential confusion by patients regarding their actual out of pocket cost and what WAC represents.

Conclusions
- The majority of those who supported the use of WAC did not demonstrate WAC understanding.
- Both industry and payer representatives demonstrated WAC understanding but had differing opinions of the proposal, against and supportive respectively.
- Healthcare professionals, industry, and payers expressed care for patient empowerment and concern with how this proposed rule will affect patients.

References

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