



**National  
Multiple Sclerosis  
Society**

March 7, 2023

Oregon State Legislature  
Senate Committee on Health Care

**RE: SUPPORT SB 565 All copays count**

Chair Patterson, Vice-Chair Hayden, Senators Bonham, Campos, Gorsek,

On behalf of the National Multiple Sclerosis Society (Society), we are writing today to support legislation which enables payments by or on behalf of a health care plan enrollee count towards their out-of-pocket costs and deductible, regardless of source. We ask the Senate Committee on Health Care to favorably report out SB 565.

Multiple sclerosis (MS) is an unpredictable, often disabling disease of the central nervous system that disrupts the flow of information within the brain, and between the brain and body. Symptoms vary from person to person and range from numbness and tingling, to walking difficulties, fatigue, dizziness, pain, depression, blindness, and paralysis. The progress, severity, and specific symptoms of MS in any one person cannot yet be predicted but advances in research and treatment are leading to better understanding and moving us closer to a world free of MS. Nearly 1 million people in the United States are currently living with MS with the highest concentrations found in the Pacific Northwest.

The Society's vision is a world free of MS and our mission is that we will cure MS while empowering people affected by MS to live their best lives. Our advocacy around expanding access to comprehensive, affordable health care is based largely on the Society's [Access to High Quality Healthcare Principles](#). It is through this lens that we will evaluate any policy proposal put forth to assess its impact on healthcare needs for people affected by MS. The availability of MS disease modifying therapies (DMTs) has transformed the treatment of MS over the last 25 years. Unfortunately for people affected by MS, the price of MS treatments has dramatically and most are nearing 6-figures in yearly cost.

Additionally, people living with MS often face a high deductible and later co-insurance costs—meaning they are often responsible for thousands of dollars in out-of-pocket costs each plan year. This poses a significant challenge in accessing needed medications.

Industry named "copay accumulators" (or accumulator adjustment programs) began from the belief that drug manufacturers' patient assistance programs are discouraging patients and their doctors from choosing generics or less-costly prescription drug alternatives. These programs are used to prohibit prescription drug coupons or other forms of prescription drug manufacturer assistance from applying towards a patient's annual deductible or out-of-pocket maximum amounts.



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In MS, not counting patient assistance towards total costs makes it much more difficult for people to get the healthcare they need. As many as 40% of people living with MS rely on assistance programs to maintain access to their disease-modifying therapy. With the implementation of industry “copay accumulator” programs, people with MS are experiencing higher cost burdens as they struggle with unexpected expenses during their deductible period. It is well-known that people with chronic and high-cost conditions like MS face significant financial hardship each year until their deductible has been met and the full relief of their health insurance kicks in. This hardship is made worse by so-called “copay accumulator” programs because preventing copay assistance from applying to a person’s deductible means it takes them longer to reach the end of the deductible period. Because patients are responsible for 100% of their health care costs until the deductible is satisfied, prolonging the deductible period can put other medical needs—such as doctors’ visits, rehab therapies, MRIs, or other medications—financially out-of-reach.

The National Multiple Sclerosis Society has called on all stakeholders in the prescription drug supply chain to come together and find real solutions to escalating price increases, barriers to care and a system too complex to navigate. It is reasonable to question the role of copay assistance programs and the potential role they play in cost and access issues—but this should not be the first change that happens. Until we find real solutions to the challenges in our healthcare system that prevent people from affordably accessing the care and treatments they need, we cannot rip away the “band-aids” people have come to rely on—like copay assistance programs. Mechanisms like copay accumulators primarily impact people who are seeking whatever avenue they can find to be able to take their needed medication.

The National MS Society supports solutions that help safeguard access for people who need life-changing medications, without getting them caught in the middle of struggles between other stakeholders.

Please vote YES on SB 565. Should you have any questions, please contact me at [Seth.Greiner@nmss.org](mailto:Seth.Greiner@nmss.org)

A handwritten signature in blue ink, appearing to read "Seth M. Greiner". The signature is fluid and somewhat abstract, with several loops and a long horizontal stroke at the bottom.

**Seth M. Greiner**  
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