

Medicare's New Adventure: The Part D Drug Benefit

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Georgetown/NORC for Kaiser Family Foundation:

Data: 152 drugs compiled from Medicare.gov, national PDPs

“Benefit Design and Formularies of Medicare Drug Plans: A Comparison of 2006 and 2007 Offerings – A First Look,” November 2006

<http://www.kff.org/medicare/upload/7589.pdf>

“An In-Depth Examination of Formularies and Other Features of Medicare Drug Plans,” April 2006 <http://www.kff.org/medicare/upload/7489.pdf>

NORC/Georgetown for MedPAC:

Data: All drugs, all PDPs and MA-PDs

Cited in MedPAC June 2006 Report to Congress,

“Chapter 7: Part D Plan Offerings”

http://www.medpac.gov/publications/congressional_reports/Jun06_Ch07.pdf

NORC/Georgetown for DHHS/ASPE:

Data: Multiple formularies and classification systems

“Issues in the Design and Implementation of Drug Formularies and Therapeutic Classes,” September 2005 <http://aspe.hhs.gov/health/reports/05/drugformularies/report.pdf>

Why Do Formularies Matter?

- Factor in beneficiaries' selection of a plan
- Restriction on beneficiaries' access to drugs
- Limitation on what physicians can prescribe
- Plan management of utilization and costs
- Tool to encourage appropriate drug use
- Leverage for negotiating prices
- Factor in containing plan, beneficiary, and federal costs

Rules and Classification Systems for Formularies

Basic Rules Plans Must Follow

- Therapeutic classification system for formulary
- Nondiscrimination criterion for overall benefit
- Pharmacy & therapeutics (P&T) committee
- Actuarial equivalence for cost sharing
- Exceptions and appeals

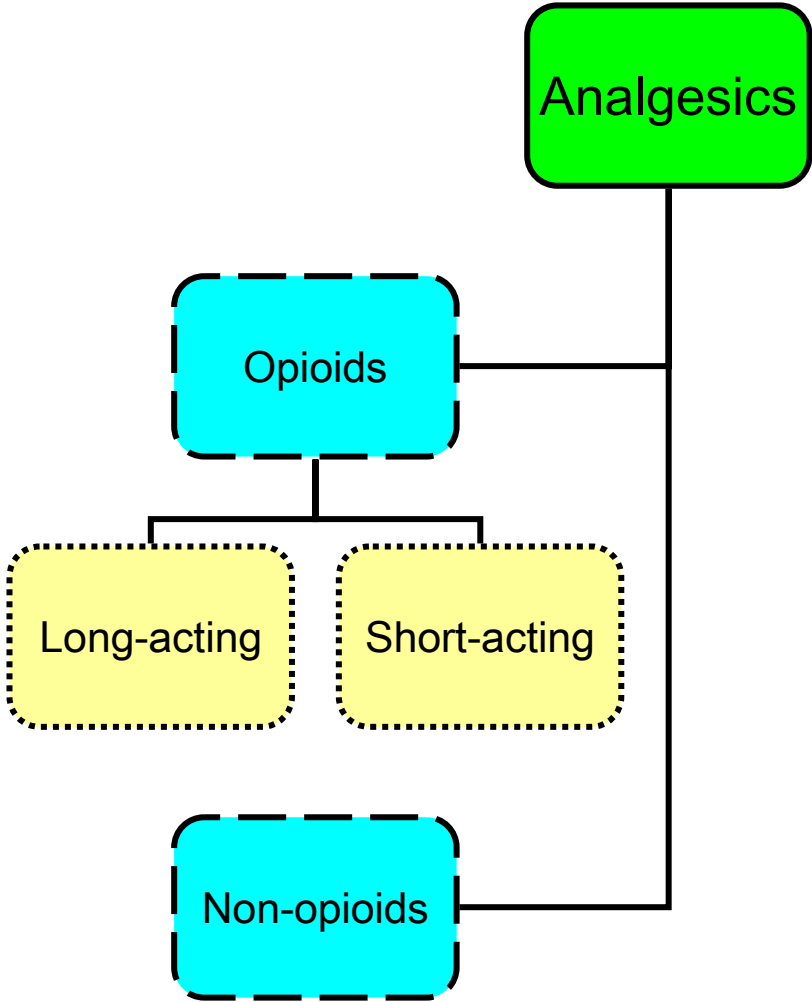
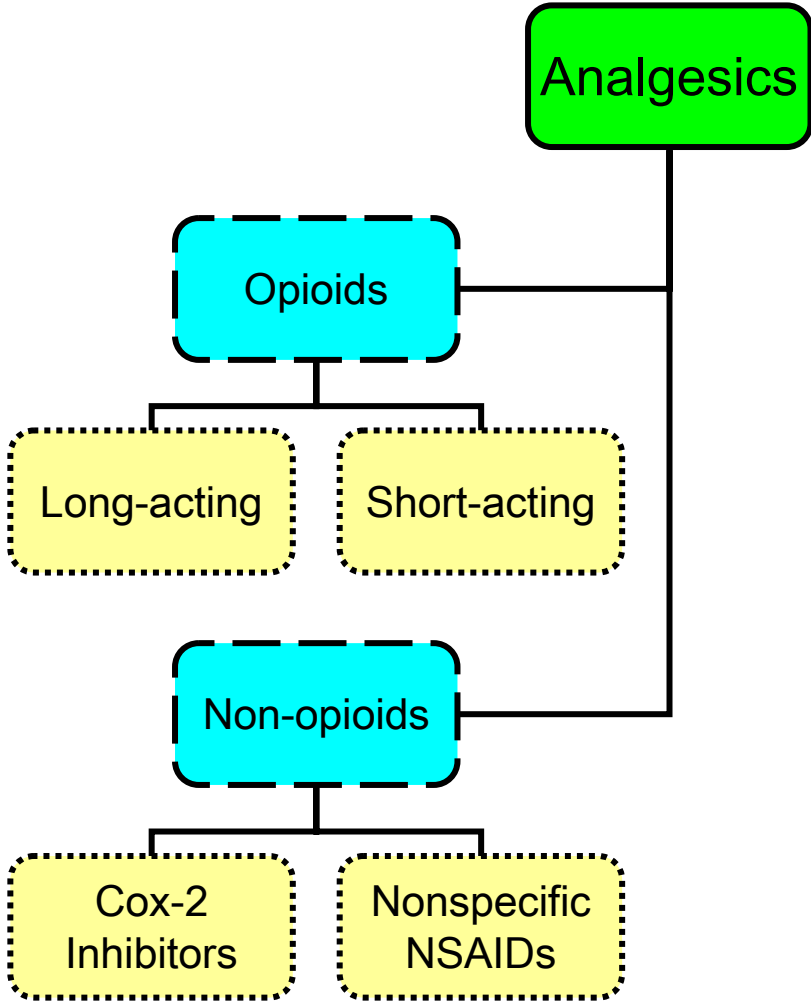
Therapeutic Classification System

- USP model guidelines
 - Level 1: Therapeutic categories
 - Level 2: Pharmacologic classes
 - Level 3: Formulary Key drug types
- Plans may substitute their own system
- 74% of formularies used USP system in 2006

| | 2006 | 2007 |
|-------------------------------|------|------|
| Therapeutic Categories | 41 | 49 |
| Pharmacologic Classes | 137 | 117 |
| Unique Categories and Classes | 146 | 133 |
| Key Drug Types | 118 | 141 |

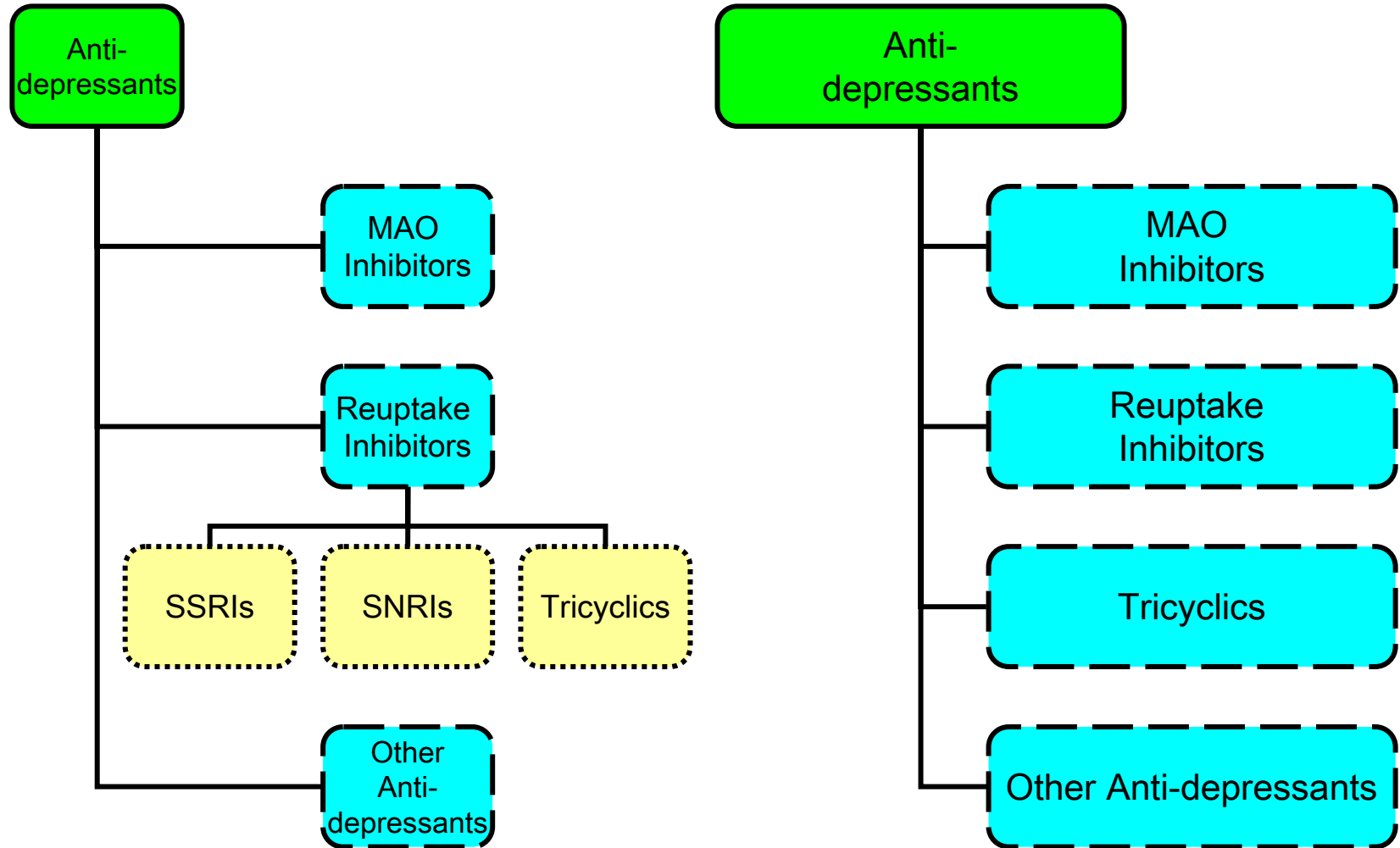
USP Analgesics Category, 2006 and 2007

(solid line=category, dashed=class, dotted=key drug type)



USP Antidepressants Category, 2006 and 2007

(solid line=category, dashed=class, dotted=key drug type)



Nondiscrimination Criterion

- *Statute*: Disapprove if design and benefits are likely to substantially discourage enrollment by certain beneficiaries
- *Rule*: Adequate coverage of the types of drugs most commonly needed by enrollees, as recognized in national treatment guidelines
- *Preamble*: Offer complete treatment options for a variety of medical conditions

Standards for a Formulary

- 2 drugs for each of 133 category/classes
- 1 drug for each of 141 key drug types
- “Most or all” drugs in selected classes
 - But not all combination drugs or special formulations (extended-release, weekly dosing)
- Drugs cited in national treatment guidelines, risk adjustment categories, or in commonly prescribed drug classes
- Special rule if tier for high-cost drugs

Formulary Coverage by Part D Plans

Number of Plans Covering Sample Drugs and Top 10 Brand-Name and Generic Drugs, 2006

| Formulary Coverage | Number of Plans | Percent of Plans |
|--------------------------------------------|-----------------|------------------|
| 152 Sample Drugs | | |
| All 152 | 0 | 0% |
| More than 90% | 13 | 37% |
| More than 80% | 15 | 43% |
| More than 70% | 27 | 77% |
| More than 60% | 35 | 100% |
| Top 10 Brand-Name and Generic Drugs | | |
| All Top 10 Brands | 18 | 51% |
| All Top 10 Generics | 32 | 91% |

Number of Sample Drugs Covered by Top 10 Plans, 2006-2007

| PDP NAME | ALL SAMPLE DRUGS | | |
|----------------------------------------------------------|----------------------------------|----------------------------------|-------------------------|
| | Number Covered (of 152), 2006 | Number Covered (of 152), 2007 | Net Change from 2006 |
| AARP Medicare Rx | 145 | 152 | +7 |
| Humana Standard | 146 | 152 | +6 |
| Humana Enhanced | 146 | 152 | +6 |
| Wellcare Signature | 106 | 107 | +1 |
| Community Care Rx Basic | 116 | 119 | +3 |
| Pacificare Saver (2006)/ United Medicare Basic (2007) | 107 | 140 | +33 |
| Medicare RX Rewards Value | 109 | 115 | +6 |
| Humana Complete | 146 | 152 | +6 |
| Silverscript (Caremark) | 109 | 112 | +3 |
| Prescription Pathway Bronze | 117 | 115 | -2 |

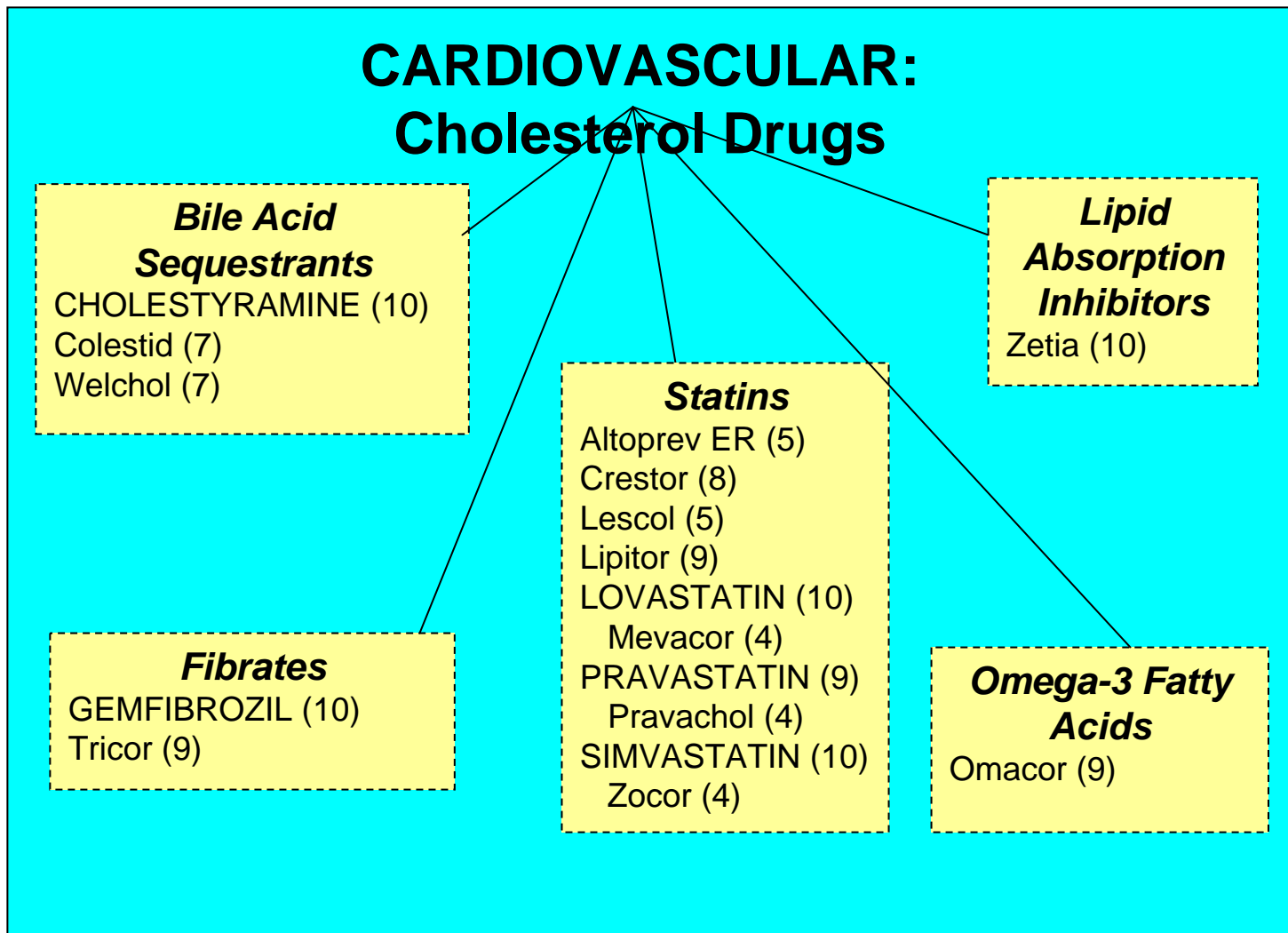
Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Number of Sample Generic and Brand-Name Drugs Covered by Top 10 Plans, 2006-2007

| PDP NAME | GENERIC DRUGS | | BRAND-NAME DRUGS | |
|--------------------------------------------------------|-------------------------|------------------|-------------------------|------------------|
| | # Covered (of 73), 2007 | Change from 2006 | # Covered (of 79), 2007 | Change from 2006 |
| AARP Medicare Rx | 73 | +1 | 79 | +6 |
| Humana Standard | 73 | +4 | 79 | +2 |
| Humana Enhanced | 73 | +4 | 79 | +2 |
| Wellcare Signature | 73 | +8 | 34 | -7 |
| Community Care Rx Basic | 68 | +2 | 51 | +1 |
| Pacificare Saver ('06)/ United Medicare Basic ('07) | 73 | +12 | 67 | +21 |
| Medicare RX Rewards Value | 73 | +5 | 42 | +1 |
| Humana Complete | 73 | +4 | 79 | +2 |
| Silverscript (Caremark) | 62 | +2 | 50 | +1 |
| Prescription Pathway Bronze | 71 | 0 | 44 | -2 |

Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Coverage of Cholesterol Drugs, Top 10 Plans, 2007



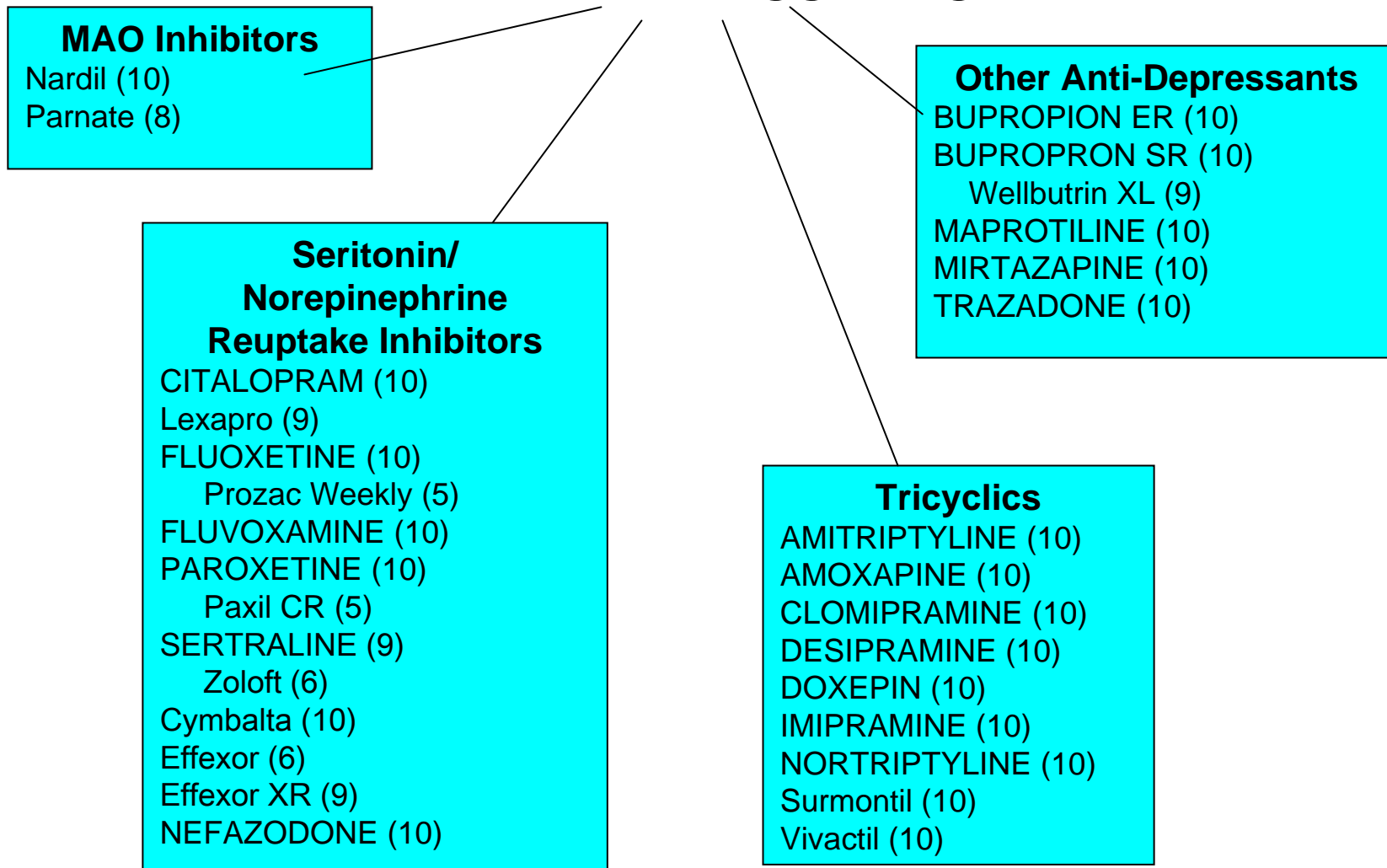
Number indicates how many of the top 10 plans list that drug on formulary.
Generic drugs are listed in upper-case font.

Coverage of Cholesterol Drugs, Top 10 Plans, 2007

| Formulary Coverage | Statins (of 10) | Bile Acid Seq (of 3) | Fibrates (of 2) | Zetia (of 1) | Omacor (of 1) |
|--------------------------------------------------------|-----------------|----------------------|-----------------|--------------|---------------|
| AARP Medicare Rx | 10 | 3 | 2 | 1 | 1 |
| Humana Standard | 10 | 3 | 2 | 1 | 1 |
| Humana Enhanced | 10 | 3 | 2 | 1 | 1 |
| Wellcare Signature | 2 | 2 | 1 | 1 | 1 |
| Community Care Rx Basic | 5 | 3 | 2 | 1 | 1 |
| Pacificare Saver ('06)/ United Medicare Basic ('07) | 7 | 3 | 2 | 1 | 1 |
| Medicare RX Rewards Value | 4 | 1 | 2 | 1 | 1 |
| Humana Complete | 10 | 3 | 2 | 1 | 1 |
| Silverscript (Caremark) | 5 | 2 | 2 | 1 | 0 |
| Prescription Pathway Bronze | 5 | 1 | 2 | 1 | 1 |

Coverage of Anti-Depressants, Top 10 Plans, 2007

ANTI-DEPRESSANTS



Number indicates how many of the top 10 plans list that drug on formulary.
Generic drugs are listed in upper-case font.

Coverage of Anti-Depressants, Top 10 Plans, 2007

| Formulary Coverage | Reuptake Inhibitors (of 13) | Tricyclics (of 9) | MAOIs (of 2) | Other (of 6) |
|--------------------------------------------------------|------------------------------------|--------------------------|---------------------|---------------------|
| AARP Medicare Rx | 13 | 9 | 2 | 6 |
| Humana Standard | 13 | 9 | 2 | 6 |
| Humana Enhanced | 13 | 9 | 2 | 6 |
| Wellcare Signature | 8 | 9 | 2 | 5 |
| Community Care Rx Basic | 9 | 9 | 2 | 6 |
| Pacificare Saver ('06)/ United Medicare Basic ('07) | 11 | 9 | 1 | 6 |
| Medicare RX Rewards Value | 10 | 9 | 2 | 6 |
| Humana Complete | 13 | 9 | 2 | 6 |
| Silverscript (Caremark) | 11 | 9 | 2 | 6 |
| Prescription Pathway Bronze | 9 | 9 | 1 | 6 |

Tiering Structure by Part D Plans

What Tier Structures Are Part D Plans Using in 2006?

| Type of Plan | Type of tier structure (percent of plans) | | | | |
|-----------------------|-------------------------------------------|-------------------|---------------------|-------------------------------------------------|---------------------|
| | 25% coinsurance, all tiers | Generic / brand | | Generic / preferred brand / non-preferred brand | |
| | | No specialty tier | Plus specialty tier | No specialty tier | Plus specialty tier |
| All PDPs N=1,429 | 9% | 29% | | 61% | |
| | | 8% | 22% | 23% | 38% |
| All MA-PDs N=1,303 | 7% | 22% | | 68% | |
| | | 16% | 6% | 15% | 53% |

Source: NORC/Georgetown for MedPAC (All drugs, all plans)

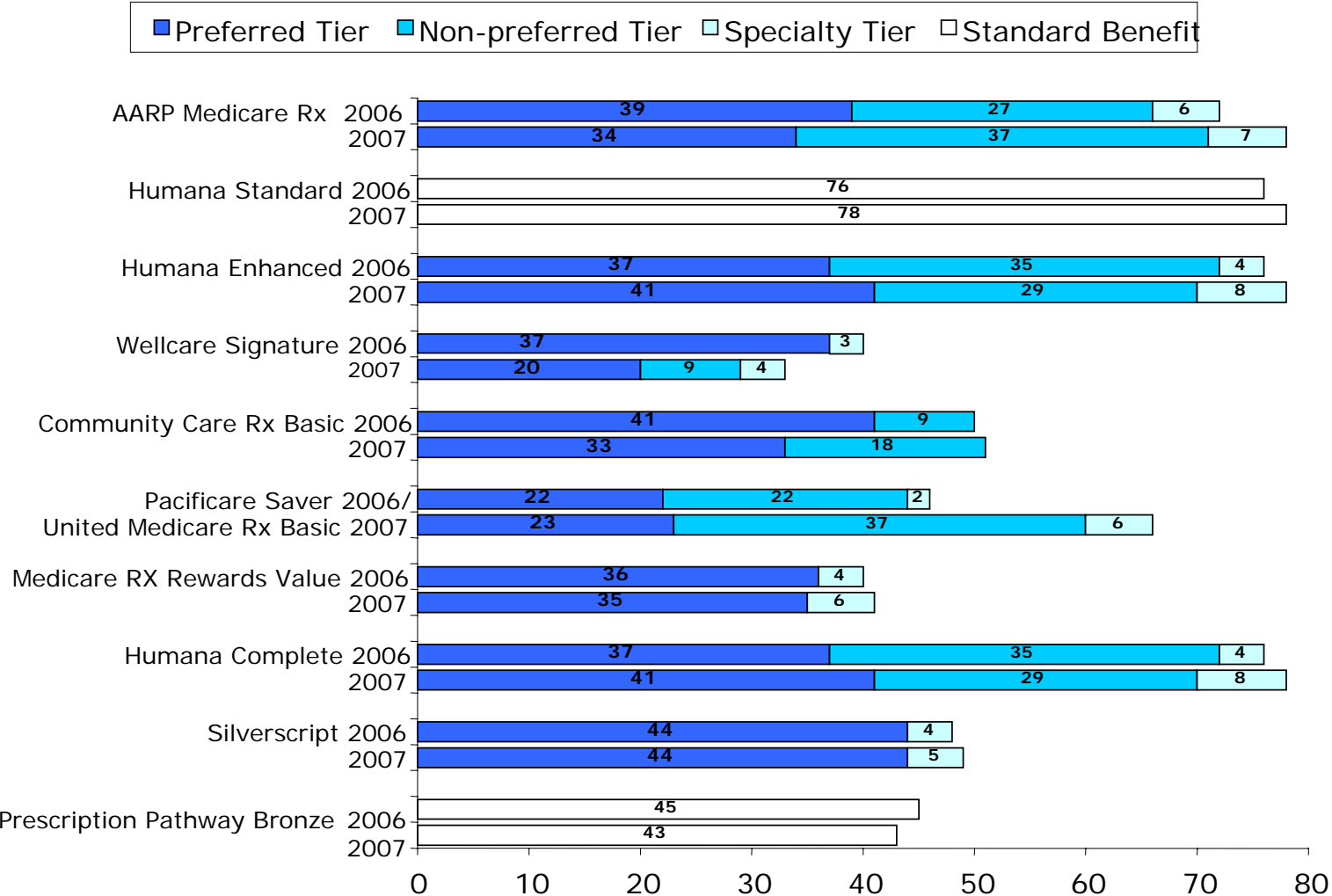
Formulary Tier Placement of Sample Drugs, by Drug Class, 2006

Percent of Sample Drugs in Each Class in Each Formulary Tier, Averaged Across All Plans

| Name of class | Tier 1 (Generic) | Tier 2 (Preferred Brands) | Tier 3 (Nonpreferred Brands) | Specialty Tier | Not covered |
|----------------------------|------------------|---------------------------|------------------------------|----------------|-------------|
| Alzheimer's | 10% | 48% | 16% | 0% | 26% |
| Antidepressants | 54% | 23% | 14% | 0% | 8% |
| Beta Blockers | 75% | 13% | 3% | 0% | 9% |
| Diabetes | 43% | 30% | 9% | 0% | 18% |
| Osteoporosis | 1% | 35% | 19% | 4% | 41% |
| Proton Pump Inhibitors | 12% | 28% | 22% | 0% | 38% |
| Calcium Channel Blockers | 46% | 17% | 9% | 2% | 26% |
| Cholesterol | 19% | 28% | 23% | 0% | 30% |
| Rheumatoid Arthritis (TNF) | 0% | 25% | 12% | 54% | 9% |
| Renin-Angiotensin | 38% | 17% | 19% | 0% | 26% |
| TOTAL | 44% | 23% | 13% | 1% | 19% |

Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Formulary Tier Placement of 78 Sample Brand-Name Drugs, 2006-2007



Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Use of Specialty Tier for Sample Drugs, Top 10 Plans, 2006-2007

| PDP Name | Cost Sharing for Specialty Tier | | Number of Sample Drugs on Specialty Tier | |
|-------------------------------------------------------------|---------------------------------|---------|------------------------------------------|------|
| | 2006 | 2007 | 2006 | 2007 |
| AARP Medicare Rx | 25% | 33% | 6 | 7 |
| Humana Standard | No Tier | No Tier | N/A | N/A |
| Humana Enhanced | 25% | 25% | 4 | 8 |
| Wellcare Signature | 31% | 33% | 3 | 4 |
| Community Care Rx Basic | No Tier | No Tier | N/A | N/A |
| Pacificare Saver (2006)/ United Medicare Rx Basic (2007) | 33% | 33% | 2 | 6 |
| Medicare Rx Rewards Value | 25% | 25% | 4 | 7 |
| Humana Complete | 25% | 25% | 4 | 8 |
| Silverscript (Caremark) | 25% | 25% | 4 | 5 |
| Prescription Pathway Bronze | No Tier | No Tier | N/A | N/A |

Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Utilization Management

Application of Utilization Management Tools, by Drug Class, 2006

Percent of Covered Sample Drugs in Each Class Subject to Utilization Management, Averaged Across All Plans

| Name of class | Prior Authorization | Quantity Limits | Step Therapy | Any UM Tool Applied |
|--------------------------|----------------------------|------------------------|---------------------|----------------------------|
| Alzheimer's | 20% | 13% | 0% | 27% |
| Antidepressants | 2% | 12% | 9% | 19% |
| Beta Blockers | 0% | 2% | 1% | 3% |
| Diabetes | 2% | 8% | 4% | 13% |
| Osteoporosis | 20% | 28% | 0% | 43% |
| Proton Pump Inhibitors | 33% | 51% | 24% | 69% |
| Calcium Channel Blockers | 0% | 8% | 0% | 8% |
| Cholesterol | 2% | 32% | 3% | 36% |
| TNF Drugs | 86% | 15% | 0% | 86% |
| Renin-Angiotensin | 1% | 16% | 31% | 48% |
| TOTAL | 6% | 14% | 7% | 24% |

Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Application of Utilization Management Tools, by Top 10 Plans, 2007

Number of 152 Sample Drugs for Each Plan Subject to Utilization Management (Increase = Bold/Red; Decrease = Italics/Blue)

| Name of class | Prior Authorization | Step Therapy | Quantity Limits |
|------------------------------------------------------------|---------------------|--------------|-----------------|
| AARP Medicare Rx | 4 | 8 | 25 |
| Humana Standard | 3 | 6 | 62 |
| Humana Enhanced | 3 | 6 | 62 |
| Wellcare Signature | 8 | 3 | 3 |
| Community Care Rx Basic | 5 | 7 | 37 |
| Pacificare Saver (2006/ United Medicare Rx Basic (2007) | 5 | 8 | 24 |
| Medicare Rx Rewards Value | 4 | 0 | 32 |
| Humana Complete | 3 | 6 | 62 |
| Silverscript (Caremark) | 14 | 0 | 8 |
| Prescription Pathway Bronze | 4 | 0 | 10 |

Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Cost of Obtaining Drugs in the Initial Coverage Period

Typical Cost-Sharing Levels for PDPs, 2006

| | Type of plan | |
|----------------------------------------------------------------------|---------------------------------------|-------------------|
| | Actuarially equivalent basic benefits | Enhanced benefits |
| <i>Plans with generic/brand tier structure</i> | | |
| Generic copay | \$5 | \$7 |
| Brand copay | \$28 | \$30 |
| Specialty tier coinsurance (if applicable) | 25% | 25% |
| <i>Plans with generic/preferred brand/non-preferred brand</i> | | |
| Generic copay | \$7 | \$5 |
| Preferred Brand copay | \$22 | \$26 |
| Nonpreferred Brand | \$55 | \$50 |
| Specialty tier coinsurance (if applicable) | 25% | 30% |

Source: NORC/Georgetown for MedPAC (All drugs, all plans)

Variation in Cost Sharing Arrangements, 2007, Top 10 Plans

| | Tier 1 (Generics) | Tier 2 (Preferred Brands) | Tier 3 (Non- preferred Brands) | Specialty Tier |
|-----------------------------|------------------------------------|---------------------------------|-----------------------------------------|-------------------|
| AARP Medicare Rx | \$6 | \$28 | \$69.10 | 33% |
| Humana Standard | Standard Benefit (25% Coinsurance) | | | |
| Humana Enhanced | <i>\$5</i> | \$30 | \$60 | 25% |
| Wellcare Signature | \$0 | <i>\$57</i> | \$85 | 33% |
| Community Care Rx Basic | \$0 | 25% | 50% | No Tier |
| United Medicare Rx Basic | <i>\$7</i> | <i>\$20</i> | <i>\$45.75</i> | 33% |
| Medicare Rx Rewards Value | \$5 | \$29 | No Tier | 25% |
| Humana Complete | <i>\$5</i> | \$30 | \$60 | 25% |
| Silverscript (Caremark) | <i>\$5</i> | \$37 | No Tier | 25% |
| Prescription Pathway Bronze | Standard Benefit (25% Coinsurance) | | | |

Higher in 2007 = Bold/Red; Lower = Italics/Blue

Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Median Monthly Cost for Sample Drugs in the Initial Coverage Period, Top 10 Plans, 2006-2007

| PDP Name | Generic Drugs | | Brand-Name Drugs | |
|-------------------------------------------------------------|---------------|---------------|------------------|----------------|
| | 2006 | 2007 | 2006 | 2007 |
| AARP Medicare Rx | \$5.00 | \$6.00 | \$28.00 | \$31.95 |
| Humana Standard | \$6.18 | <i>\$3.24</i> | \$22.92 | \$23.06 |
| Humana Enhanced | \$7.00 | <i>\$5.00</i> | \$35.10 | <i>\$30.00</i> |
| Wellcare Signature | \$0.00 | \$0.00 | \$66.00 | \$82.00 |
| Community Care Rx Basic | \$0.00 | \$0.00 | \$35.75 | \$41.58 |
| Pacificare Saver (2006)/ United Medicare Rx Basic (2007) | \$7.50 | <i>\$7.00</i> | \$52.70 | <i>\$45.75</i> |
| Medicare Rx Rewards Value | \$5.00 | \$5.00 | \$33.49 | <i>\$32.42</i> |
| Humana Complete | \$7.00 | <i>\$5.00</i> | \$35.10 | <i>\$30.00</i> |
| Silverscript (Caremark) | \$9.00 | <i>\$5.00</i> | \$33.11 | \$37.00 |
| Prescription Pathway Bronze | \$5.58 | <i>\$5.46</i> | \$38.41 | \$38.79 |

Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Monthly Cost in Initial Coverage Period of Popular Drugs, Top 10 Plans, 2007 (I)

| PDP NAME | Actonel | Diovan | Fosamax | Lipitor | Nexium |
|----------------------------------------------------------------|----------------|----------------|----------------|----------------|----------------|
| AARP Medicare Rx | \$28 | \$28 | \$28 | \$28 | \$28 |
| Humana Standard | \$18 | \$13 | \$18 | \$18 | \$33 |
| Humana Enhanced | \$30 | \$30 | \$30 | \$30 | \$30 |
| Wellcare Signature | \$57 | \$51 | \$57 | \$88 | \$170 |
| Community Care Rx Basic | \$19 | \$14 | \$19 | \$19 | \$34 |
| Pacificare Saver (2006)/ United Medicare Rx Basic (2007) | \$20 | \$20 | \$20 | \$46 | \$20 |
| Medicare RX Rewards Value | \$29 | \$29 | \$29 | \$29 | \$136 |
| Humana Complete | \$30 | \$30 | \$30 | \$30 | \$30 |
| Silverscript (Caremark) | \$37 | \$37 | \$37 | \$37 | \$37 |
| Prescription Pathway Bronze | \$19 | \$13 | \$19 | \$19 | \$35 |
| MEDIAN FOR ALL PLANS | \$28.50 | \$28.50 | \$28.50 | \$29.50 | \$33.91 |

Note: Shaded cell indicates off-formulary drug for specific plan.

Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Monthly Cost in Initial Coverage Period of Popular Drugs, Top 10 Plans, 2007 (II)

| PDP NAME | Norvasc | Plavix | Toprol XL | Zocor | Zoloft |
|------------------------------------------------------------|----------------|----------------|----------------|-----------------|----------------|
| AARP Medicare Rx | \$28 | \$69 | \$27 | \$69 | \$69 |
| Humana Standard | \$16 | \$31 | \$6 | \$35 | \$19 |
| Humana Enhanced | \$30 | \$30 | \$26 | \$60 | \$60 |
| Wellcare Signature | \$57 | \$85 | \$25 | \$166 | \$106 |
| Community Care Rx Basic | \$17 | \$32 | \$7 | \$169 | \$109 |
| Pacificare Saver (2006)/ United Medicare Rx Basic ('07) | \$46 | \$46 | \$27 | \$167 | \$78 |
| Medicare RX Rewards Value | \$29 | \$29 | \$26 | \$141 | \$29 |
| Humana Complete | \$30 | \$30 | \$26 | \$60 | \$60 |
| Silverscript (Caremark) | \$37 | \$37 | \$26 | \$166 | \$37 |
| Prescription Pathway Bronze | \$16 | \$32 | \$7 | \$167 | \$107 |
| MEDIAN FOR ALL PLANS | \$29.50 | \$31.89 | \$25.76 | \$153.42 | \$64.55 |

Note: Shaded cell indicates off-formulary drug for specific plan.

Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Coverage and Monthly Cost of Statins for Treating High Cholesterol, By Plan, 2007

| Statins | Cres-tor | Lescol | Lipitor | Lova-statin | Meva-Cor | Prava-statin | Prava-Chol | Simva-statin | Zocor |
|-----------------------------|----------|--------|---------|-------------|----------|--------------|------------|--------------|-------|
| United AARP | \$28 | \$62 | \$28 | \$6 | \$69 | \$6 | \$69 | \$6 | \$69 |
| Humana Standard | \$21 | \$15 | \$18 | \$8 | \$17 | \$30 | \$34 | \$31 | \$35 |
| Humana Enhanced | \$30 | \$30 | \$30 | \$5 | \$60 | \$5 | \$60 | \$5 | \$60 |
| Wellcare Signature | \$95 | \$65 | \$88 | \$0 | \$79 | \$97 | \$181 | \$0 | \$166 |
| MembrHealth CCRX Basic | \$22 | \$69 | \$19 | \$0 | \$82 | \$0 | \$185 | \$0 | \$169 |
| Pacificare Saver | \$20 | \$46 | \$46 | \$7 | \$80 | \$7 | \$183 | \$7 | \$167 |
| Unicare Medicare Rx Rewards | \$85 | \$62 | \$29 | \$5 | \$69 | \$5 | \$138 | \$5 | \$141 |
| Caremark Silverscript | \$37 | \$61 | \$37 | \$5 | \$80 | \$5 | \$182 | \$5 | \$166 |
| Rx Pathway Bronze | \$22 | \$63 | \$19 | \$16 | \$80 | \$16 | \$183 | \$32 | \$167 |

Notes: Cost in the initial coverage period; Shaded cell indicates off-formulary drug for plan. 33

Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Coverage and Monthly Cost of SSRIs for Treating Depression, By Plan, 2007

| SSRIs | Citalo- -pram | Lexa- -pro | Fluox- -etine | Prozac Weekly | Fluvox- -amine | Parox- -etine | Paxil CR | Sertra- -line | Zoloft |
|-----------------------------|------------------|---------------|------------------|------------------|-------------------|------------------|-------------|------------------|--------|
| United AARP | \$6 | \$28 | \$6 | \$69 | \$6 | \$6 | \$69 | \$6 | \$69 |
| Humana Standard | \$2 | \$18 | \$1 | \$24 | \$7 | \$8 | \$22 | \$17 | \$19 |
| Humana Enhanced | \$5 | \$30 | \$5 | \$60 | \$5 | \$5 | \$60 | \$5 | \$60 |
| Wellcare Signature | \$0 | \$71 | \$0 | \$93 | \$0 | \$0 | \$118 | \$0 | \$106 |
| CCRX Basic | \$0 | \$38 | \$0 | \$96 | \$0 | \$0 | \$121 | \$0 | \$109 |
| Pacificare Saver | \$7 | \$46 | \$7 | \$46 | \$46 | \$7 | \$46 | \$7 | \$78 |
| Unicare Medicare Rx Rewards | \$5 | \$88 | \$5 | \$98 | \$5 | \$5 | \$90 | \$5 | \$29 |
| Silverscript | \$5 | \$37 | \$5 | \$93 | \$5 | \$5 | \$89 | \$70 | \$37 |
| Rx Pathway Bronze | \$3 | \$19 | \$3 | \$99 | \$18 | \$18 | \$91 | \$18 | \$107 |

Notes: Cost in the initial coverage period. Shaded cell indicates off-formulary drug.

Source: Georgetown/NORC for Kaiser Family Foundation (152 drugs, natl. plans)

Looking to 2007 and Beyond

What Are We Seeing in 2007?

- Mostly the same organizations, plus new ones, offering benefits
- Changes in the USP classification
- Stability in CMS guidelines
- Modest changes in plan designs
- Modest growth in on-formulary drugs
- Modest increase in cost of sample drugs
- Shifts in beneficiary enrollment?

What Might We Expect in 2008?

- Statutory changes in risk corridors
- Will most organizations stay in Part D?
- Further changes to the USP classification?
- Changes in the CMS guidelines?
- Changes in plan designs and formularies?
- Shifts in beneficiary enrollment?