

May 8, 2024

The Maryland Prescription Drug Affordability Board
16900 Science Drive, Suite 112-114
Bowie MD, 20715

Re: Comments on the *Drugs Referred to the Stakeholder Council*

Dear Members and Staff of Maryland's Prescription Drug Affordability Board,

The Institute for Clinical and Economic Review ([ICER](http://www.icer.org)) is pleased to submit comments on the *Drugs Referred to the Stakeholder Council*, which were first presented at the March 25, 2024 Board meeting of Maryland's Prescription Drug Affordability Board. ICER is an independent non-profit research organization that evaluates medical evidence and convenes public deliberative bodies to help stakeholders improve patient outcomes and improve affordability. Our reports are used by the Veterans Health Administration and by most Medicaid and private insurance plans to help inform their formulary determinations, support drug price negotiation, and improve access for patients. As part of the international community of value assessment organizations (sometimes referred to as health technology assessment), we also participate in many activities related to the development of methods of evidence assessment, cost-effectiveness analysis, and public deliberation that can support efforts to achieve affordable access to high-value care.

As part of our work, we have conducted assessments of two of the prescription drugs on the *Drugs Referred to the Stakeholder Council* – Skyrizi for psoriasis, and Dupixent for both asthma and atopic dermatitis. Given our expertise in this field, we believe we can offer valuable insights to help inform the Prescription Drug Affordability Board of Maryland's efforts to make prescription drugs more affordable and accessible for Marylanders.

ICER's findings on Skyrizi for Psoriasis

In 2018 ICER produced an [Evidence Report on Psoriasis](#) focused on multiple interventions for plaque psoriasis including risankizumab (Skyrizi®). As part of ICER's analyses, we utilize the [ICER Evidence Rating Matrix™](#) to evaluate the overall strength of evidence for a variety of outcomes. Based on the evidence in ICER's 2018 Evidence Report on Psoriasis,

ICER rated Skyrizi “A” when compared to placebo. An ICER rating of “A” is defined as superior, meaning a high certainty of a substantial (moderate-large) net health benefit.

Additionally, as part of all analyses an ICER “health benefit price benchmark” is developed for the new intervention, which reflects prices aligned with commonly-cited long-term cost-effectiveness thresholds ranging from \$100,000 to \$150,000 per equal value life-year (evLY) gained. The prices represent the prices paid by insurers, net of rebates and other concessions, that would be required to reach these cost-effectiveness thresholds. In short, it is the top price range at which a health system can reward innovation and better health for patients without doing more harm than good. Further information on the ICER Health Benefit Price Benchmark (HBPB) can be found in [ICER’s Value Assessment Framework](#). For the 2018 Evidence Report on Psoriasis ICER determined the Health Benefit Price Benchmark range for Skyrizi to be \$27,300 - \$ 39,800 per year.

ICER’s findings on Dupixent for the treatment of Asthma Associated with Type 2 Inflammation

In ICER’s [2018 assessment of biologics for severe asthma](#) one of the interventions of interest was dupilumab (Dupixent®). ICER’s Health Benefit Price Benchmark (HBPB) range for Dupixent was \$10,100 - \$14,300 per year. At the time, a key policy recommendation from ICER was that the manufacturers should lower the prices of biologic therapies for asthma so they align with the added value they bring to patients. Based on the evidence, ICER rated Dupixent “C+” relative to stand care. The “C+” rating is defined as Comparable or Incremental, meaning moderate certainty of a comparable or small net health benefit, with high certainty of at least a comparable net health benefit.

ICER’s findings on Dupixent for the treatment of Atopic Dermatitis

ICER’s [2021 Atopic Dermatitis Analysis](#) found Dupixent’s Health Benefit Price Benchmark (HBPB) range to be \$29,000 - \$39,500 per year. Using [ICER Evidence Rating Matrix™](#) Dupixent, for the treatment of Atopic Dermatitis, was rated “A” defined as Superior – High certainty of a substantial (moderate-large) net health benefit

One final note regarding Therapeutic Alternatives. As the Board considers appropriate therapeutic alternative for the SGLT-2 inhibitors Farxiga and Jardiance, we call your

attention to the recently-approved SGLT-2 inhibitor Brenzavvy. Brenzavvy is being sold not through the traditional insurance system, but through entities like [Mark Cuban Cost Plus Drug Company](#), and is offered for an annual price of \$600. The transparency of the price of Brenzavvy may be a helpful data point as the Board considers its review of Farxiga and Jardiance.

We thank Maryland's Prescription Drug Affordability Board for the opportunity to comment on Skyrizi for Psoriasis and Dupixent for Asthma and Atopic Dermatitis, two of the drugs on the *Drugs Referred to the Stakeholder Council*, and are available to respond to any follow-up questions the Board may have.

Sincerely,



Sarah K. Emond, MPP
President and Chief Executive Officer
Institute for Clinical and Economic Review (ICER)
www.icer.org

Attachments:

1. Atlas SJ, Brouwer E, Fox G, Carlson JJ, Campbell JD, Agboola F, Hansen RN, Pearson SD, Rind DM. JAK Inhibitors and Monoclonal Antibodies for the Treatment of Atopic Dermatitis: Effectiveness and Value; Evidence Report. Institute for Clinical and Economic Review, July 9, 2021. <https://icer.org/assessment/atopic-dermatitis-2021/#timeline>
2. Banken R, Agboola F, Ellis A, Chapman R, Segal C, Fazioli K, Ollendorf DA, Pearson SD. Targeted Immunomodulators for the Treatment of Moderate-to-Severe Plaque Psoriasis: Effectiveness and Value; Evidence Report. Institute for Clinical and Economic Review, August 3, 2018. <https://icer.org/assessment/psoriasis-2018/#timeline>
3. Tice JA, Walsh JME, Synott P, Kumar VM, Adair E, Rind DM, Pearson SD. Biologic Therapies for Treatment of Asthma Associate with Type 2 Inflammation: Effectiveness, Value, and Value-Based Price Benchmarks; Evidence Report. Institute for Clinical and Economic Review, December 20, 2018. <https://icer.org/assessment/asthma-2018/#timeline>