

Copay Accumulators in the Workplace

According to our review of publicly available documents, the following Fortune 100 companies have implemented a copay accumulator program in their health plans:

AllState

“Some medications may qualify for a third-party copay assistance card/program, which could lower your out-of-pocket costs. If copay assistance is used for a specialty medication, only the amount you pay will be applied to your Deductible and Out-of-Pocket Maximum. Any amount paid through the copay card/program for specialty medications will not be applied to your Deductible or Out-of-Pocket Maximum. Copay cards/programs cannot be used through the mail order pharmacy. Contact CVS Caremark for additional information.”

Amazon

“Your out-of-pocket expense is the maximum amount you will pay before your plan sponsor reduces your co-payments. For an individual, the out-of-pocket maximum for prescriptions filled at retail or mail order pharmacies is \$4150.00 every year. If applicable to your plan the following applies to your Out-of-Pocket based on percentage: If you order a brand-name medication that has a generic equivalent, the difference in cost between the brand-name medication and generic medication will not apply.”

ConocoPhillips

“NOTE: Some specialty medications may qualify for third party assistance programs which could lower your out-of-pocket costs for those products. For any such specialty medication where third party assistance is used, coinsurance amounts that are paid by a manufacturer coupon or rebate will not apply toward your annual deductible or annual out-of-pocket maximum.”

DuPont

“If you qualify for assistance from a manufacturer or foundation, a CVS Specialty benefit specialist will help you manage the process of enrolling in that assistance program. Any financial assistance you apply to your costs for your medicine is not considered an out-of-pocket expense for you. Therefore, such assistance doesn't count towards your deductible or annual out-of-pocket maximum. The amount that will count towards your deductible or out-of-pocket maximum is what you pay after you apply the coupon, discount, or other assistance to your medicine, copay, or coinsurance.”

General Electric

“What is not included in the out-of-pocket limit? Premiums, balance-billing charges. The difference in cost between a brand and generic drug when a generic is available, manufacturers' coupons and rebates, and health care this plan doesn't cover.”

Liberty Mutual Insurance Group

“Some specialty medications may qualify for third party copayment assistance programs which could lower your out of pocket costs for those products. For any such specialty medication where third party copayment assistance is used, the Member shall not receive credit toward their maximum Out-of-Pocket or Deductible for any Copayment or Coinsurance amounts that are applied to a manufacturer coupon or rebate.”

PepsiCo

“Co-Pay Assist Programs are third-party programs that may help you pay for certain high cost medications. These medications are normally specialty medications issued through Accredo, Express Scripts' specialty pharmacy. If applicable, Co-Pay Assist Programs pay all or a substantial portion of your cost for a prescribed medication. Individuals should contact Express Scripts at 888-737-7479 with questions regarding whether a Co-Pay Assist Program applies to a specific prescribed medication. The amount paid by a Co-Pay Assist Program is not an amount that is paid by you and you are not required to repay that amount. For this reason, such amounts are not credited to your deductible or out of pocket maximum. However, the actual amount that you do pay for the medication (if any) after the Co-Pay Assist Program payment has been applied to your cost, is credited to your deductible and out of maximum, because like any other co-pay, this amount is actually paid by you. Please note that the 2018 Healthy Advantage plan design changes introducing per prescription maximums are intended to reduce the impact of high cost medications on your out of pocket cost. The per prescription cost maximums, per IRS guidelines, can only apply after you have met your deductible.”

Walmart

“Discounts, coupons, pharmacy discount programs or similar arrangements provided by drug manufacturers or pharmacies to assist you in purchasing prescription drugs (including any prescription drug discount/ coupons provided to pharmacies when you fill a prescription) will not count toward the medical plan's annual out-of-pocket maximum. In addition, if you have coverage under the HSA Plan, such charges will not count toward the HSA Plan's network annual deductible.”

Most of these policies will exclude the value of manufacturer coupons and financial assistance from an enrollee's deductible/and or maximum out-of-pocket costs, regardless of whether the enrollee received a prescription for a brand or a generic medication. Amazon is the only company that has implemented a policy that only excludes the value of financial assistance from an enrollee's cost-sharing responsibilities if the enrollee fills a prescription for a brand medication when a generic equivalent is available. This middle-ground policy aligns with recent federal rules that permit commercial health plans to exclude the value of third-party financial assistance when an enrollee fills a prescription for a brand medication when a generic equivalent is available. Several other Fortune 100 Companies may have implemented a copay accumulator program in their health plans, but information on these plans is not publicly available. Of the plans that are publicly available, twenty-two of them are confirmed not to have implemented a copay accumulator policy.