



February 5, 2025

The Honorable Brett Barker
House Commerce Committee
Subcommittee Chair
Iowa State Capitol
Des Moines, IA 50319

The Honorable Shannon Lundgren
House Commerce Committee
Committee Chair
Iowa State Capitol
Des Moines, IA 50319

The Honorable Elizabeth Wilson
House Commerce Committee
Iowa State Capitol
Des Moines, IA 50319

RE: Bill HSB 99 – Copay Accumulator Program Reform

Members of the House Commerce Subcommittee:

On behalf of the Vision Health Advocacy Coalition, I am writing to support Bill HSB 99. For Iowa residents, this legislation brings attention to growing effect of pharmacy benefit managers on drug pricing. While the Vision Health Advocacy Coalition supports the larger bill, we would like to highlight the cost-sharing provision, which would ensure patients with vision conditions can access and afford their medical treatments by ensuring they can utilize copay assistance without fear of surprise out-of-pocket costs.

The [Vision Health Advocacy Coalition](http://www.visionhealthadvocacy.org) (VHAC) promotes patient-centered policies that make life-changing treatments, services, and devices more accessible for people with vision conditions such as thyroid eye disease, glaucoma, Sjögren's, dry eye, macular degeneration, and diabetic retinopathy. Through our network of member organizations, VHAC encourages the advancement of ocular science and innovation, educates patients, healthcare providers, and policymakers about access challenges, promotes better vision care delivery, and advocates for access to prevention and appropriate treatment for all patients.

Copay Accumulator Programs in Iowa Threaten Access to Treatment for Vision Patients

Copay assistance is third-party financial assistance, often from manufacturers, that help patients meet their cost-sharing requirements. Acting as payment toward a patient's prescription cost-sharing requirements, copay assistance lowers patient costs at the pharmacy counter and assists patients in meeting their deductible, or annual out-of-pocket cost limit. However, many insurance policies implement "copay accumulator programs," which prohibit third-party payments from counting toward patients' deductible. In turn, this creates barriers for patients by restricting the benefits that copay assistance can provide.

For patients with vision conditions, copay accumulator programs are dangerous and threaten a patient's quality of life. While insurance companies will accept a patient payment made with third-party assistance, these programs frequently lead to surprise out-of-pocket costs due to the programs disallowing these payments from counting toward the patient's annual deductible. These programs may force vision patients to ration medications and discontinue treatment altogether, which can ultimately lead to vision loss or irreversible blindness.

Bill HSB 99 Protects Iowa Residents Against Surprise Out-of-Pocket Costs

Bill HSB 99 would support patients by ensuring all payments made on behalf of an insurance plan member, including those made with third-party assistance, are counted toward the patient's out-of-pocket maximum, protecting affordability and accessibility. This would allow patients to manage their vision conditions and maintain medication access.

On behalf of the Vision Health Advocacy Coalition, we urge your support for Bill HSB 99 to protect patients with vision conditions. If we can provide further details or answer any questions, please get in touch with Olivia Perry at operry@allianceforpatientaccess.org.

Sincerely,

Olivia Perry

Olivia Perry
Coalition Director
Vision Health Advocacy Coalition