



May 18, 2022

Federal Trade Commission  
600 Pennsylvania Avenue, NW  
Washington, DC 20580

Docket FTC-2022-0015, Solicitation for Comment Concerning the Business Practices of  
Pharmacy Benefit Managers

To Whom It May Concern:

I am writing to you on behalf of the Asthma and Allergy Foundation of America (AAFA). AAFA is the leading patient organization advocating for people with asthma and allergies, and the oldest asthma and allergy patient group in the world. We appreciate the FTC's attention to the business practices of Pharmacy Benefit Managers, or PBMs.

For our patient community, affordable and convenient access to drugs is crucial:

- An estimated 26 million adults (10.8%) and 5.7 million children (7.6%) have food allergies.<sup>1,2</sup> People living with food allergies and other life-threatening allergies must have access to epinephrine auto-injectors in order to immediately treat anaphylaxis. There is also an emerging category of drugs for oral immunotherapy to help reduce allergen sensitivity. People with allergies may also need various formulations of corticosteroids, antihistamines, and other drugs to manage their symptoms.
- Nearly 25 million people, or 7.7% of the U.S. population, have asthma.<sup>3</sup> People with asthma may need one or more medications to manage their symptoms and respond to attacks. These can include quick-relief medicines for sudden symptoms; controller medicines that address ongoing problems with the airways; medicines that combine both categories; and biologics that address airway swelling. Many people have both allergies and asthma, and therefore need a broad set of medications to stay healthy.

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<sup>1</sup> Gupta, R. S., Warren, C. M., Smith, B. M., Jiang, J., Blumenstock, J. A., Davis, M. M., Schleimer, R. P., & Nadeau, K. C. (2019). Prevalence and Severity of Food Allergies Among US Adults. *JAMA Network Open*, 2(1), e185630. <https://doi.org/10.1001/jamanetworkopen.2018.5630>

<sup>2</sup> Gupta, R. S., Warren, C. M., Smith, B. M., Blumenstock, J. A., Jiang, J., Davis, M. M., & Nadeau, K. C. (2018). The Public Health Impact of Parent-Reported Childhood Food Allergies in the United States. *Pediatrics*, 142(6). <https://doi.org/10.1542/peds.2018-1235>

<sup>3</sup> Pate CA, Zahran HS, Qin X, Johnson C, Hummelman E, Malilay J. Asthma Surveillance — United States, 2006–2018. *MMWR Surveill Summ* 2021;70(No. SS-5):1–32. DOI: <http://dx.doi.org/10.15585/mmwr.ss7005a1>



Because access to medications is so important to the people we represent, we ask that the FTC address the following questions:

1. How do PBMs affect drug pricing? Do PBM rebate structures raise prices or reduce barriers for consumers?
2. How do PBMs impact drug tiering? We are particularly concerned when even generics are placed on higher cost-sharing tiers, as for example a recent Avalere study has found is increasingly the case among Medicare Part D plans.<sup>4</sup>
3. What role do PBMs play in designing utilization management protocols? Many of our patients face barriers to appropriate treatment when unwarranted step therapy or “fail first” policies limit their access to needed drugs.

Overall, we hope that you approach this analysis from the patient perspective. For AAFA, ultimately the question is not how PBMs, manufacturers, and insurers represent their respective interests, but how the outcome affects patient access and, ultimately, health.

If you would like any further information, please contact me at [kmendez@aafa.org](mailto:kmendez@aafa.org).

Sincerely,

Kenneth Mendez  
President and Chief Executive Officer  
Asthma and Allergy Foundation of America

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<sup>4</sup> Avalere, “57% of Generic Drugs Are Not on 2022 Part D Generic Tiers.” January 2022. Available at <https://avalere.com/insights/57-of-generic-drugs-are-not-on-2022-part-d-generic-tiers>