



January 17, 2024

**Via electronic communication**

Vermont House of Representatives  
115 State Street  
Montpelier, Vermont  
05633-5301  
[CNeal@leg.state.vt.us](mailto:CNeal@leg.state.vt.us)

Re: Statement in Support of Vermont Copay Accumulator Ban

Dear Members of the House Committee on Health:

Aimed Alliance is a 501(c)(3) not-for-profit health policy organization that seeks to protect and enhance the rights of health care consumers and providers. We support passing H.766, which would limit insurers and pharmacy benefit managers' use of copay accumulator programs.

When patients cannot afford the cost of their prescription drugs, they may rely on third-party financial assistance from pharmaceutical manufacturers, charitable organizations, and others to meet their plans' cost-sharing requirements for their medications. Typically, the value of this assistance counts toward the individual's cost for the medication at the pharmacy counter and towards their deductible and annual out-of-pocket limit. However, health plans are increasingly implementing copay accumulator programs, which permit health plans to accept third-party assistance without counting this assistance towards the individual's deductible and annual out-of-pocket limit. Third-party assistance programs are not limitless and can be exhausted. When this assistance is depleted consumers may be forced to switch or stop their medications as their copay is once again unaffordable, resulting in poor medication adherence and increasing negative health outcomes and long-term health care costs.

A 2023 report found that half of Vermont marketplace plans included a copay accumulator program.<sup>1</sup> The Vermont state legislature can take action to protect copay assistance by passing House Bill 766, which includes a provision that would require health plans to count third-party assistance towards an enrollee's contribution to an out-of-pocket maximum, deductible, copayment, coinsurance or other cost-sharing requirements.

Sincerely,

Ashira Vantrees  
Counsel

---

<sup>1</sup> The AIDS Institute, *Vermont: Copay Assistance Diversion Programs* <https://aidsinstitute.net/documents/Copays-Rpt-Vermont.pdf>.