

Impact of H.R. 5376 Phase-in for Plasma Therapies on Part D Stakeholders

Commissioned by CSL Behring

Jake Klaisner, FSA, MAAA
 Madeleine Cline, ASA, MAAA
 Adam Barnhart, FSA, MAAA



CSL Behring (CSL) engaged Milliman to analyze the implications on individual Medicare Part D spending if plasma therapies were subject to a phase-in of liability for the Manufacturer Discount Program (MDP) as outlined in the November 3 version of H.R. 5376, also known as the Build Back Better Act.¹ The provisions outlined within H.R. 5376 may continue to evolve as this legislation moves through Congress. As such, the parameters prescribed in legislation may change prior to the finalization of H.R. 5376. This report contains a summary of our findings.

The results in this report consider only the following sections within of H.R. 5376:

- Title XIII, Subtitle I, Part 3, which addresses benefit redesign in Medicare Part D
- Section 139401, which addresses cost sharing for insulin products in Part D

H.R. 5376 includes additional changes to the Medicare Part D program including price negotiation of drugs selected by the U.S. Department of Health and Human Services (HHS) and prescription drug price inflation rebates, as well as other less substantial changes to the treatment of prescription drugs. These additional changes are outside of the scope of this report. We anticipate the impact of nonmodeled changes to the Medicare Part D program in H.R. 5376 would have minimal impact to the estimates in this report for the stakeholder impacts if plasma therapies were subject to the phase-in. We include further discussion of this later in the report.

Results of Analysis

Table 1 shows the total 10-year estimated costs and impacts for four scenarios by stakeholder for the individual Medicare Part D market. We include results for all manufacturers as well as the subset of manufacturer liability attributable to plasma therapy claims. The assumption of the phase-in level specifically for plasma therapies at the levels described for each scenario (and in detail in the Methodology and Assumptions section below) was provided by CSL. The annual phase-in levels under Scenarios 1 and 2 are consistent with the parameters within H.R. 5376 while Scenarios 3 and 4 lower the catastrophic manufacturer liability to 10% from 20%. The phase-in levels were provided by CSL for all scenarios. The application of the phase-in for plasma therapies is not a provision of H.R. 5376 at the time of the publication of this report.

Table 1 CSL Behring Impact of Alternative Plasma Therapy Phase-in Under H.R. 5376 Benefit Design – Individual Nationwide Population 2022 Through 2031 Medicare Part D Program Costs (billions)								
Proposal	Stakeholder Costs				Stakeholder Changes Relative to Baseline			
	Member	Manufacturer			Member	Manufacturer		
		Federal Government	All	Plasmas		Federal Government	All	Plasmas
Baseline H.R. 5376	\$433.6	\$1,087.9	\$329.2	\$5.7	N/A	N/A	N/A	N/A
Scenario 1	\$433.8	\$1,088.7	\$328.3	\$4.8	\$0.1	\$0.7	-\$0.9**	-\$0.9**
Scenario 2	\$433.9	\$1,089.6	\$327.2	\$3.7	\$0.3	\$1.7	-\$2.0	-\$2.0
Scenario 3	\$433.9	\$1,089.2	\$327.6	\$4.2	\$0.2	\$1.3	-\$1.5	-\$1.5
Scenario 4	\$434.1	\$1,090.6	\$325.9	\$2.5	\$0.5	\$2.7	-\$3.2	-\$3.2

* "Manufacturer Liability – Plasmas" is a subset of "Manufacturer Liability – All" and includes manufacturer payments payable only for plasma claims.

** Sum of all stakeholder impacts within a scenario may not sum to \$0 due to rounding.

¹ The full text of H.R. 5376 is available at <https://rules.house.gov/sites/democrats.rules.house.gov/files/BILLS-117HR5376RH-RCP117-18.pdf>.

The baseline and four scenarios outlined in Table 1 represent the following:

- **Baseline H.R. 5376:** Total individual Medicare Part D market cost assuming the benefit design outlined in H.R. 5376 is enacted in 2024 (ignoring the impact of inflation rebates and price negotiation).
- **Scenario 1:** Impact to stakeholders if plasma therapy claims for low-income (LI) members follow the phase-in for specified manufacturers under Section 139201 of H.R. 5376 with the MDP increasing from 1% in 2024 to 20% in 2030 in the catastrophic phase for LI members.
- **Scenario 2:** Impact to stakeholders if plasma therapy claims for all members follow the phase-in for specified manufacturers under Section 139201 of H.R. 5376 with the MDP increasing from 1% in 2024 to 20% in 2030 in the catastrophic phase for all members.
- **Scenario 3:** Consistent with Scenario 1, but plasma therapy claims in the catastrophic² phase for LI members are subject to a maximum of 10% (as opposed to 20%) manufacturer liability.
- **Scenario 4:** Consistent with Scenario 2, but plasma therapy claims in the catastrophic phase for all members are subject to a maximum of 10% (as opposed to 20%) manufacturer liability.

In all scenarios, the total cost over the 10-year horizon to the federal government increases by \$0.7 billion to \$2.7 billion and total member costs increase between \$0.1 billion and \$0.5 billion. These cost increases are driven by the decrease in manufacturer liability for plasma therapies of \$0.9 billion to \$3.2 billion. The impacts for Scenarios 3 and 4 are greater than their Scenarios 1 and 2 counterparts due to the 10% manufacturer liability assumed in the catastrophic phase of the benefit. In general, the impacts tend to be small given the limited utilization of plasma therapies relative to the size of the entire Medicare Part D program.

Table 2 shows the 10-year estimated costs and impacts for all scenarios for each cost component for the individual Medicare Part D market with the same manufacturer breakout as Table 1.

Table 2 CSL Behring Impact of Alternative Plasma Therapy Phase-in Under H.R. 5376 Benefit Design – Individual Nationwide Population 2022 Through 2031 Medicare Part D Program Costs (Billions)										
Proposed Benefit Design	Member Cost Sharing	Member Premium	Total Member Costs	Federal Reinsurance	Direct Subsidy	LICS	LIPS	Total Government Costs	Manufacturer	
									All	Plasmas
Total Costs										
Baseline H.R. 5376	\$256.3	\$177.3	\$433.6	\$281.7	\$544.2	\$189.3	\$72.7	\$1,087.9	\$329.2	\$5.7
Scenario 1	\$256.3	\$177.4	\$433.8	\$281.7	\$544.8	\$189.3	\$72.8	\$1,088.7	\$328.3	\$4.8
Scenario 2	\$256.3	\$177.6	\$433.9	\$281.7	\$545.7	\$189.3	\$72.9	\$1,089.6	\$327.2	\$3.7
Scenario 3	\$256.3	\$177.5	\$433.9	\$281.7	\$545.3	\$189.3	\$72.8	\$1,089.2	\$327.6	\$4.2
Scenario 4	\$256.3	\$177.8	\$434.1	\$281.7	\$546.6	\$189.3	\$72.9	\$1,090.6	\$325.9	\$2.5
Total Change - Relative to Baseline										
Scenario 1	\$0.0	\$0.1	\$0.1	\$0.0	\$0.7	\$0.0	\$0.1	\$0.7	-\$0.9**	-\$0.9**
Scenario 2	\$0.0	\$0.3	\$0.3	\$0.0	\$1.5	\$0.0	\$0.1	\$1.7**	-\$2.0	-\$2.0
Scenario 3	\$0.0	\$0.2	\$0.2	\$0.0	\$1.2	\$0.0	\$0.1	\$1.3	-\$1.5	-\$1.5
Scenario 4	\$0.0	\$0.5	\$0.5	\$0.0	\$2.5	\$0.0	\$0.2	\$2.7	-\$3.2	-\$3.2

* "Manufacturer Liability – Plasmas" is a subset of "Manufacturer Liability – All" and includes manufacturer payments payable only for plasma claims.

** Sum of all stakeholder impacts within a scenario may not sum to \$0 due to rounding.

The funding components shown in Table 2 are as follows:

- **Member cost sharing:** The portion of total cost sharing paid out-of-pocket by members (exclusive of government subsidies).
- **Member premium:** The portion of total member premiums paid out-of-pocket by members (exclusive of government subsidies). For our analysis, we only model a defined standard benefit and therefore member premium is comprised only of basic premium. Plans with enhanced benefits also have additional supplemental premium, but the inclusion of supplemental premium is unlikely to materially impact the modeled changes in each scenario.
- **Total member costs:** The sum of member cost sharing and member premium.

² The catastrophic phase of the benefit refers to claims adjudicated after a member reaches their maximum out-of-pocket (MOOP). We modeled the manufacturer liability phase-in according to the schedule shown in Table 5, found in the Methodology and Assumptions section below.

- **Federal reinsurance:** The average projected portion of claims paid by the federal government in the catastrophic phase net of rebates.
- **Direct subsidy (DS):** The estimated direct subsidy paid from the federal government to plans.
- **Low-income cost sharing (LICS) subsidies:** The portion of total cost sharing for LI members subsidized by the federal government.
- **Low-income premium subsidies (LIPS):** The portion of total member premiums for LI members subsidized by the federal government. The magnitude of both LICS and LIPS subsidies varies based on a member's income level and institutional status.
- **Total federal government costs:** The sum of the prior four federal government categories above: Federal reinsurance, DS, LICS, and LIPS.
- **Manufacturer liability – All:** The portion of claims paid by pharmaceutical manufacturers through the MDP. This value excludes all other cash flows outside of the MDP, including rebates paid to plan sponsors or any revenue from product sales.
- **Manufacturer liability – Plasma:** The portion of “Manufacturer Liability – All” attributable to plasma therapy claims.

The high-level impacts discussed above are due to specific changes in the detailed funding components defined above. The key dynamics that change stakeholder liabilities are discussed below.

- **Manufacturer impact:** Under H.R. 5376, non-specified³ manufacturers are subject to a 10% liability in the initial coverage phase and 20% liability in the catastrophic phase of the Medicare Part D benefit. However, specified manufacturers would have some or all of this financial responsibility (depending on member income status) for their drugs phased in between 2024 and 2030. If the manufacturer liability phase-in is extended to plasma therapies as well, the manufacturer liability will decrease.

On a 10-year horizon, this represents a decrease in liability between \$0.9 billion and \$3.2 billion, representing between a 16% and 56% decrease in MDP costs for plasma manufacturers across the four scenarios. The lower end of this liability change is Scenario 1, where only LI plasma therapy claims receive the phase-in, with a fully phased-in catastrophic liability of 20%. Scenario 4 is the largest impact where all plasma therapy claims are subject to the phase-in with a fully phased-in catastrophic liability of 10%. The changes in MDP liability for Scenarios 2 and 3 fall between these endpoints, with decreases in MDP liability offset by increases in government and member costs as outlined in the subsequent bullets.

- **Federal government impact:** Federal government costs would increase by between \$0.7 billion and \$2.7 billion. This offsets about 84% of the decrease in manufacturer liability and represents an increase of between 0.1% and 0.2% in total government costs, depending on the scenario. Mirroring the magnitude of the decrease in costs for manufacturers, government costs increase the most for Scenario 4 and the least in Scenario 1. The increase in government costs relative to the baseline is driven by an increase in direct subsidy, which, in turn, is caused by the increase in plan liability in the catastrophic phase due to reduced manufacturer liability for plasma therapy claims. There are no changes to federal reinsurance as members move through the benefit design at a consistent rate, independent of manufacturer liability (unlike the current Medicare Part D benefit design).
- **Member impact:** Member premium increases relative to the baseline due to the increased plan liability discussed above. Similarly, the government funds more of the program in LIPS costs due to the same dynamic. Under the H.R. 5376 benefit design, the Medicare Part D national average member premium calculation changes from 25.5% to 23.5% of plan bid and reinsurance costs. Without this change, the premium increase would be greater as a larger portion of program costs would be funded by the member.

Our modeling is based on the Medicare Part D benefit redesign proposed in the November 3, 2021, version of H.R. 5376.⁴ This analysis does not include potential behavioral impacts or contemplate the government price negotiation or inflation rebate components of H.R. 5376.

Additionally, we provide the following detailed results in our appendices:

- Appendix A: H.R. 5376 Benefit Redesign Scenario Costs – 2022 Through 2031 (billions of dollars)
- Appendix B: Impact of H.R. 5376 Benefit Redesign Scenarios – 2022 Through 2031 (billions of dollars)
- Appendix C: H.R. 5376 Benefit Redesign Scenario Costs – 2022 Through 2031 (per member per year)
- Appendix D: Impact of H.R. 5376 Benefit Redesign Scenarios – 2022 Through 2031 (per member per year)

³ Specified manufacturer is defined as a manufacturer comprising both less than 1% of total Medicare Part D and less than 1% of total Medicare Part B expenditures.

⁴ See <https://rules.house.gov/sites/democrats.rules.house.gov/files/BILLS-117HR5376RH-RCP117-18.pdf>.

Discussion

H.R. 5376 BENEFIT REDESIGN

H.R. 5376 implements a benefit design with key differences relative to the current benefit design. These key benefit differences include the following, though other minor differences exist:

- Establishment of a \$2,000 MOOP in 2024
- Change to member liability in the initial coverage phase from 25% to 23% beginning in 2024
- Establishment of a maximum member copay of \$35 per 30-day prescription for insulin products beginning in 2023 to replace the current Senior Savings Model
- Medicare Part D national average member premium revised from 25.5% to 23.5% of plan bid and reinsurance costs
- Establishment of the MDP, which requires manufacturer payments of 10% and 20% of gross applicable costs in the initial coverage phase and catastrophic benefit phases, respectively.
 - This new program would apply to non-low-income (NLI) and LI member claims
 - Claims from certain specified manufacturers will be subject to a phase-in of the manufacturer liability between 2024 and 2030
- Sunset of the Coverage Gap Discount Program (CGDP)
- A reduction of federal reinsurance in the catastrophic phase to 20% for applicable claims and 40% for nonapplicable claims

The Methodology and Assumptions section below details key modeled aspects for H.R. 5376's benefit design changes.

H.R. 5376 INFLATION REBATES AND DRUG PRICE NEGOTIATION

H.R. 5376 contains two other key provisions that will impact Medicare Part D in the coming decade, inflation rebates and drug price negotiation. Key aspects of these provisions are summarized here: <https://www.milliman.com/en/insight/the-build-back-better-act-medicare-parts-b-and-d-key-changes>.

This analysis does not consider the impact of inflation rebates or drug price negotiation. While these items are likely to significantly decrease the total cost of the Medicare Part D program, they are unlikely to materially change the impact estimates outlined in this report for the following reasons:

- **Drug price negotiation**
 - Nearly all plasma products have relatively high gross unit costs but are infrequently utilized, resulting in few members using these products and a total Medicare Part D spend near only 1% of gross drug costs.⁵ This makes these products unlikely to be selected for negotiation within the projection horizon outlined in this report. Additionally, if plasma therapies were selected, the cost increases to the member and government would be smaller than estimated in this report, as negotiated products will not be part of the MDP. Though not the focus of this analysis, the Senate Finance Committee version of H.R. 5376 excludes plasma therapies from the drug price negotiation aspects of the legislation.⁶
 - The negotiation and reduced point-of-sale prices for non-plasma therapy negotiated products would slow the progression of members through the benefit design. However, nearly all plasma therapy claims are substantial enough to move a member through to the catastrophic phase, regardless of other claims. This would likely lead to minimal changes in the impact of the plasma-specific phase-in if drug price negotiation were modeled.

⁵ CMS. Medicare Part D Drug Spending Dashboard & Data. Retrieved December 23, 2021, from <https://www.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/Information-on-Prescription-Drugs/MedicarePartD>.

⁶ See <https://www.finance.senate.gov/imo/media/doc/12.11.21%20Finance%20Text.pdf>.

- **Inflation rebates**

- Annual price increases for most of the plasma therapy market have been near Consumer Price Index for All Urban Consumers (CPI-U) change levels for the past several years, ranging from 1% to 4.5% increases in unit costs between 2016 and 2021.⁷ It is unlikely plasma manufacturers would change this trajectory going forward in light of the inflation rebate implementation.
- However, other products do trend at a higher rate than CPI-U changes. This may lead to a slower progression through the benefit as described above for drug price negotiation. For the same reasons discussed above, notably the relatively high unit cost of plasma therapy claims, it is unlikely a market-wide change to slow unit cost trends would have material impacts on the impact of phasing in plasma therapy liability under the MDP.

Methodology and Assumptions

NATIONAL AVERAGE METHODOLOGY

We used Milliman's Part D Analysis and Rating Tool (DART) to complete this analysis. This model is designed to project historical claims data forward for the purpose of creating Medicare Part D bids. The manual rates, adjustment factors, assumed demographics, and risk scores in the Milliman Medicare Part D pricing models are based on Medicare Part D experience of more than 60 million member months across 34 U.S. regions and Puerto Rico. The underlying data reflects a nationwide, individual market-specific population. Our model relies on separate LI and NLI claim samples allowing for detailed claim-level adjudication and summaries by product type and distribution channel.

For nationwide individual market 2022 values, we calibrated to 2022 national average amounts published by the Centers for Medicare and Medicaid Services (CMS), and then used the manual rate data described above with trend and generic pipeline adjustments to project to 2023 and all subsequent years. Overall trends are applied as both utilization and unit cost trend, with considerations for specialty versus traditional product trends, consistent with Milliman Part D trend research. Gross cost trends were calibrated to the 2021 Medicare Trustees Report for years 2023 through 2030 and extrapolated for 2031 using historical trends. We adjusted the data for the following key national average assumptions based on Milliman's 2022 Medicare Part D Contract Survey, which surveyed plan sponsors on the assumptions underlying their Medicare Part D bid development:

- Contracting, including discounts from average wholesale price (AWP) and dispensing fees, separate by channel and drug type.
- Non-benefit expense and gain/loss.
- Manufacturer and pharmacy rebates (DIR) as a percentage of allowed costs, including with 0.2% annual growth.

For our projection, we used the defined standard benefit in all years for all scenarios. We used defined standard deductible estimates from the 2021 Medicare Trustees Report for years 2023 through 2030 and extrapolated the parameters for 2031 using historical trends. Similarly, we used the average change in the 2021 Medicare Trustees Report true out-of-pocket (TrOOP) estimates for 2023 through 2030 in order to estimate future MOOPs. This methodology was applied to all proposed benefit design changes. When developing results for Scenarios 1 through 4, we held all assumptions not specified in H.R. 5376 constant. For both the baseline H.R. 5376 and all the four scenarios we assume no behavioral reactions from stakeholders. Specifically, we did not assume increased utilization from members due to lower cost sharing or reduced rebates from manufacturers as a result of the introduction of MDP.

We used the 2021 Medicare Trustees Report to estimate the total number of beneficiaries and the proportion of LI and NLI members nationwide across our projection horizon. To estimate LIPS, we assumed that, on average, 95% of LI premiums are paid by the government through premium subsidies.

Our modeling excludes coverage through Employer Group Waiver Plans (EGWPs), which account for about 15% of Medicare Part D beneficiaries. These plans have a more complicated structure, a different treatment of the CGDP, and tend to have enhanced member cost sharing. As a result, the impact to the EGWP market could differ significantly.

ADDITIONAL ASSUMPTIONS

For all projections, we assume a benefit design consistent with H.R. 5376. Table 3 details key benefit parameter changes relative to the benefit design under current legislation.

⁷ Medi-Span and internal Milliman claim databases.

Table 3
CSL Behring
Key H.R. 5376 Medicare Part D Benefit Design Changes

Benefit Parameter	Baseline H.R. 5376 and Scenarios 1 & 2	Scenarios 3 & 4*
2024 MOOP	\$2,000	\$2,000
Insulin Member Copay Cap (per 30-day prescription)	\$35	\$35
ICL Member Cost Share	23%	23%
Manufacturer Discount – ICL (2030)	10%	10%
Manufacturer Discount – Catastrophic (2030, non-plasmas)	20%	20%
Manufacturer Discount – Catastrophic (2030, plasmas)*	20%	10%
Federal Reinsurance – Applicable	20%	20%
Federal Reinsurance – Non-Applicable	40%	40%

* Scenario 3 incorporates phase-in to 10% for LIS beneficiaries only and Scenario 4 incorporates 10% phase-in for all beneficiaries for plasma therapies.

An additional provision of the benefit design in H.R. 5376 is a phase-in for some manufacturers to steadily increase their liability under the MDP to the ultimate levels of 10% in the ICL and 20% in the catastrophic phase of the benefit. To classify manufacturers as specified manufacturers or specified small⁸ manufacturers we used the 2019 Medicare Part D CMS dashboard data summarizing nationwide drug expenditure by manufacturer and product. We relied on Medi-span to group drugs by manufacturer to develop our assumed manufacturer classification in our claim adjudication modeling. Consistent with the H.R. 5376 as of November 3, 2021, we applied phase-in to the following types of manufacturers as outlined in Table 4. Table 5 shows the phase-in by year assumed for plasma therapy claims under each scenario.

Table 4
CSL Behring
Medicare Part D Manufacturer Liability Phase-in Application
H.R. 5376

Manufacturer Type	Income Status	
	NLI	LI
Not specified or specified small	No phase-in	No phase-in
Specified, not specified small	No phase-in	Phase-in
Specified small	Phase-in	Phase-in

Table 5
CSL Behring
H.R. 5376 Phase-in for Manufacturer Discount Program Liability in Medicare Part D

Year	Baseline H.R. 5376		Scenarios 1 and 2*		Scenarios 3 and 4*	
	ICL Phase**	Catastrophic Phase All Eligible Claims	Catastrophic Phase Plasma Claims	Catastrophic Phase All Other Eligible Claims	Catastrophic Phase Plasma Claims	Catastrophic Phase All Other Eligible Claims
2024	1%	1%	1%	1%	1%	1%
2025	2%	2%	2%	2%	2%	2%
2026	5%	5%	5%	5%	5%	5%
2027	8%	8%	8%	8%	8%	8%
2028	10%	10%	10%	10%	10%	10%
2029	10%	15%	15%	15%	10%	15%
2030 to 2031	10%	20%	20%	20%	10%	20%

* Under Scenarios 1 and 3, plasma claims from LI beneficiaries are subject to the phase-in parameters. Under Scenarios 2 and 4, plasma claims from all beneficiaries are subject to the phase-in parameters.

** ICL phase-in percentages are consistent for all eligible claims across scenarios and the baseline.

The products considered plasma therapies for this report are listed in Appendix E.

As discussed above, our modeling does not incorporate other major pieces of H.R. 5376 including drug price negotiation or drug inflationary penalties. Additionally, our analysis simplifies some elements of the Medicare Part D benefit redesign proposed under H.R. 5376. The limitations include:

- The manufacturer assignment to “specified” or “specified small” could change annually under H.R. 5376. We assumed a static manufacturers’ definition in all 10 years of our projection.

⁸ Specified small manufacturer is defined as a manufacturer comprising both less than 1% of total Medicare Part D and less than 1% of total Medicare Part B expenditures and one of the manufacturer’s drugs comprises more than 80% of its total Medicare Part D expenditure.

- The \$35 per 30-day script copay cap for insulins can apply to only a subset of insulins for 2023 and 2024 and then must apply to all insulins in 2025 and beyond. We assumed the copay cap would apply to all insulins in every year of our projection.
- We limited our analysis to the defined standard benefit design. Enhanced benefit designs would generate different stakeholder impacts.
- We did not model the member's ability in H.R. 5376 to allow members to smooth cost sharing throughout the year.

For each of the national average projections, we assumed no behavioral changes. Costs to beneficiaries, manufacturers, and plans will likely vary from historical patterns due to behavioral changes driven by changing financial incentives, though these behavioral responses will be varied and are difficult to predict. We limited the analysis to benefit design changes only, excluding other proposal provisions, which may have an impact on costs and utilization during the same time period. We did not model the potential impacts of how changing plan incentives may change the plan designs available in the market and how enhanced plan designs might be treated in any new legislation. We also did not model any impact of the recalibration of the Medicare Part D risk adjustment methodology or coefficients, which is not yet known and difficult to predict.

Caveats, Limitations on Use, and Qualifications

This report was developed to help CSL better understand the impact of potential changes to the standard Medicare Part D benefit design. This information may not be appropriate, and should not be used, for other purposes.

This report is intended for the internal use of CSL. CSL may share this information with external parties with Milliman's prior consent. We do not intend this information to benefit any third party, even if we permit the distribution of our work product to such third party. Any third-party recipient of this report desiring professional guidance should not rely upon Milliman's work product, but should engage qualified professionals for advice appropriate to its specific needs. Any releases of this report to a third party should be in its entirety. Milliman does not endorse any public policy or advocacy position on matters discussed in this report.

Please note that, in preparing our estimates, we relied upon information from CSL, a Milliman database of national Medicare Part D claims, public information from CMS, and the 2021 Medicare Trustees Report. Actual results will certainly vary for specific health plans and manufacturers due to differences in demographics, trends, discount arrangements, formulary, utilization patterns, and rebate arrangements, among other factors.

Milliman created several models to price Medicare Part D benefit designs, which were used to support the results in this letter. We reviewed the models, including their inputs, calculations, and outputs, for consistency, reasonableness, and appropriateness to the intended purpose and in compliance with generally accepted actuarial practice and relevant actuarial standards of practice (ASOP). The results and models, including all inputs, calculations, and outputs may not be appropriate for any other purpose.

The authors are actuaries for Milliman, members of the American Academy of Actuaries, and meet the qualification standards of the Academy to render the actuarial opinion contained herein. To the best of our knowledge and belief, this information is complete and accurate and has been prepared in accordance with generally recognized and accepted actuarial principles and practices.

This report outlines the review and opinions of the authors and not necessarily those of Milliman. The terms of Milliman's Master Services Agreement with CSL, effective October 15, 2018, apply to this report and its use.

APPENDICES

Appendix A
CSL Behring
Part D Redesign Scenario Costs - Nationwide Population
2022 through 2031 (Billions of Dollars)

H.R. 5376											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Total
Member Cost Sharing	\$24.0	\$24.9	\$21.0	\$22.3	\$23.7	\$25.0	\$26.8	\$28.2	\$29.3	\$31.2	\$256.3
Member Premium	\$12.1	\$13.5	\$15.5	\$16.4	\$17.3	\$18.3	\$19.5	\$20.5	\$21.3	\$22.8	\$177.3
Total Member Costs	\$36.0	\$38.5	\$36.5	\$38.7	\$41.0	\$43.4	\$46.2	\$48.7	\$50.6	\$54.1	\$433.6
Reinsurance	\$47.7	\$52.6	\$17.5	\$18.5	\$20.0	\$21.5	\$23.2	\$25.0	\$26.8	\$28.9	\$281.7
Direct Subsidy	\$3.1	\$4.3	\$56.5	\$59.2	\$62.3	\$65.4	\$68.5	\$71.3	\$74.3	\$79.3	\$544.2
LICS	\$31.6	\$33.6	\$12.3	\$13.2	\$14.1	\$15.1	\$15.5	\$16.5	\$18.0	\$19.5	\$189.3
LIPS	\$5.1	\$5.7	\$6.4	\$6.7	\$7.1	\$7.5	\$7.9	\$8.3	\$8.7	\$9.3	\$72.7
Total Government Costs	\$87.5	\$96.1	\$92.6	\$97.6	\$103.6	\$109.5	\$115.2	\$121.1	\$127.8	\$137.0	\$1,087.9
Manufacturer Liability	\$9.8	\$10.7	\$27.3	\$29.3	\$32.5	\$35.9	\$39.3	\$43.7	\$48.3	\$52.4	\$329.2
Bid Amount	\$19.7	\$22.7	\$75.9	\$79.6	\$84.0	\$88.3	\$93.5	\$97.6	\$100.9	\$107.8	\$770.0
Total Gross Allowed Costs	\$191.3	\$209.7	\$227.4	\$242.0	\$260.3	\$279.3	\$298.6	\$319.4	\$341.3	\$368.6	\$2,737.9
H.R. 5376 with Phase-in to LI - Plasma Therapies (20% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Total
Member Cost Sharing	\$24.0	\$24.9	\$21.0	\$22.3	\$23.7	\$25.0	\$26.8	\$28.2	\$29.3	\$31.2	\$256.3
Member Premium	\$12.1	\$13.5	\$15.6	\$16.4	\$17.4	\$18.4	\$19.5	\$20.5	\$21.3	\$22.8	\$177.4
Total Member Costs	\$36.0	\$38.5	\$36.5	\$38.7	\$41.0	\$43.4	\$46.3	\$48.7	\$50.6	\$54.1	\$433.8
Reinsurance	\$47.7	\$52.6	\$17.5	\$18.5	\$20.0	\$21.5	\$23.2	\$25.0	\$26.8	\$28.9	\$281.7
Direct Subsidy	\$3.1	\$4.3	\$56.6	\$59.3	\$62.5	\$65.6	\$68.6	\$71.4	\$74.3	\$79.3	\$544.8
LICS	\$31.6	\$33.6	\$12.3	\$13.2	\$14.1	\$15.1	\$15.5	\$16.5	\$18.0	\$19.5	\$189.3
LIPS	\$5.1	\$5.7	\$6.4	\$6.7	\$7.1	\$7.5	\$8.0	\$8.3	\$8.7	\$9.3	\$72.8
Total Government Costs	\$87.5	\$96.1	\$92.8	\$97.8	\$103.7	\$109.7	\$115.3	\$121.2	\$127.8	\$137.0	\$1,088.7
Manufacturer Liability	\$9.8	\$10.7	\$27.1	\$29.1	\$32.3	\$35.8	\$39.2	\$43.6	\$48.3	\$52.4	\$328.3
Bid Amount	\$19.7	\$22.7	\$76.1	\$79.8	\$84.1	\$88.5	\$93.6	\$97.7	\$100.9	\$107.8	\$770.9
Total Gross Allowed Costs	\$191.3	\$209.7	\$227.4	\$242.0	\$260.3	\$279.3	\$298.6	\$319.4	\$341.3	\$368.6	\$2,737.9
H.R. 5376 with Phase-in to NLI/LI - Plasma Therapies (20% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Total
Member Cost Sharing	\$24.0	\$24.9	\$21.0	\$22.3	\$23.7	\$25.0	\$26.8	\$28.2	\$29.3	\$31.2	\$256.3
Member Premium	\$12.1	\$13.5	\$15.6	\$16.4	\$17.4	\$18.4	\$19.5	\$20.5	\$21.3	\$22.8	\$177.6
Total Member Costs	\$36.0	\$38.5	\$36.5	\$38.7	\$41.0	\$43.4	\$46.3	\$48.7	\$50.6	\$54.1	\$433.9
Reinsurance	\$47.7	\$52.6	\$17.5	\$18.5	\$20.0	\$21.5	\$23.2	\$25.0	\$26.8	\$28.9	\$281.7
Direct Subsidy	\$3.1	\$4.3	\$56.8	\$59.5	\$62.6	\$65.7	\$68.7	\$71.5	\$74.3	\$79.3	\$545.7
LICS	\$31.6	\$33.6	\$12.3	\$13.2	\$14.1	\$15.1	\$15.5	\$16.5	\$18.0	\$19.5	\$189.3
LIPS	\$5.1	\$5.7	\$6.4	\$6.7	\$7.1	\$7.5	\$8.0	\$8.4	\$8.7	\$9.3	\$72.9
Total Government Costs	\$87.5	\$96.1	\$93.0	\$98.0	\$103.9	\$109.8	\$115.4	\$121.3	\$127.8	\$137.0	\$1,089.6
Manufacturer Liability	\$9.8	\$10.7	\$26.9	\$28.9	\$32.1	\$35.6	\$39.0	\$43.5	\$48.3	\$52.4	\$327.2
Bid Amount	\$19.7	\$22.7	\$76.3	\$79.8	\$84.3	\$88.7	\$93.8	\$97.8	\$100.9	\$107.8	\$771.9
Total Gross Allowed Costs	\$191.3	\$209.7	\$227.4	\$242.0	\$260.3	\$279.3	\$298.6	\$319.4	\$341.3	\$368.6	\$2,737.9
H.R. 5376 with Phase-in to LI - Plasma Therapies (10% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Total
Member Cost Sharing	\$24.0	\$24.9	\$21.0	\$22.3	\$23.7	\$25.0	\$26.8	\$28.2	\$29.3	\$31.2	\$256.3
Member Premium	\$12.1	\$13.5	\$15.6	\$16.4	\$17.4	\$18.4	\$19.5	\$20.5	\$21.3	\$22.9	\$177.5
Total Member Costs	\$36.0	\$38.5	\$36.5	\$38.7	\$41.0	\$43.4	\$46.3	\$48.7	\$50.6	\$54.1	\$433.9
Reinsurance	\$47.7	\$52.6	\$17.5	\$18.5	\$20.0	\$21.5	\$23.2	\$25.0	\$26.8	\$28.9	\$281.7
Direct Subsidy	\$3.1	\$4.3	\$56.6	\$59.3	\$62.6	\$65.7	\$68.7	\$71.5	\$74.5	\$79.5	\$545.3
LICS	\$31.6	\$33.6	\$12.3	\$13.2	\$14.1	\$15.1	\$15.5	\$16.5	\$18.0	\$19.5	\$189.3
LIPS	\$5.1	\$5.7	\$6.4	\$6.7	\$7.1	\$7.5	\$8.0	\$8.4	\$8.7	\$9.3	\$72.8
Total Government Costs	\$87.5	\$96.1	\$92.8	\$97.8	\$103.7	\$109.7	\$115.3	\$121.3	\$128.0	\$137.2	\$1,089.2
Manufacturer Liability	\$9.8	\$10.7	\$27.1	\$29.1	\$32.3	\$35.8	\$39.2	\$43.5	\$48.1	\$52.1	\$327.6
Bid Amount	\$19.7	\$22.7	\$76.1	\$79.8	\$84.1	\$88.5	\$93.6	\$97.8	\$101.2	\$108.1	\$771.5
Total Gross Allowed Costs	\$191.3	\$209.7	\$227.4	\$242.0	\$260.3	\$279.3	\$298.6	\$319.4	\$341.3	\$368.6	\$2,737.9
H.R. 5376 with Phase-in to NLI/LI - Plasma Therapies (10% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Total
Member Cost Sharing	\$24.0	\$24.9	\$21.0	\$22.3	\$23.7	\$25.0	\$26.8	\$28.2	\$29.3	\$31.2	\$256.3
Member Premium	\$12.1	\$13.5	\$15.6	\$16.4	\$17.4	\$18.4	\$19.5	\$20.5	\$21.4	\$22.9	\$177.8
Total Member Costs	\$36.0	\$38.5	\$36.5	\$38.7	\$41.0	\$43.4	\$46.3	\$48.7	\$50.6	\$54.1	\$434.1
Reinsurance	\$47.7	\$52.6	\$17.5	\$18.5	\$20.0	\$21.5	\$23.2	\$25.0	\$26.8	\$28.9	\$281.7
Direct Subsidy	\$3.1	\$4.3	\$56.8	\$59.5	\$62.6	\$65.7	\$68.7	\$71.6	\$74.6	\$79.7	\$546.6
LICS	\$31.6	\$33.6	\$12.3	\$13.2	\$14.1	\$15.1	\$15.5	\$16.5	\$18.0	\$19.5	\$189.3
LIPS	\$5.1	\$5.7	\$6.4	\$6.7	\$7.1	\$7.5	\$8.0	\$8.4	\$8.7	\$9.4	\$72.9
Total Government Costs	\$87.5	\$96.1	\$93.0	\$98.0	\$103.9	\$109.8	\$115.4	\$121.5	\$128.2	\$137.4	\$1,090.6
Manufacturer Liability	\$9.8	\$10.7	\$26.9	\$28.9	\$32.1	\$35.6	\$39.0	\$43.3	\$47.9	\$51.9	\$325.9
Bid Amount	\$19.7	\$22.7	\$76.3	\$80.0	\$84.3	\$88.7	\$93.8	\$98.0	\$101.4	\$108.3	\$773.1
Total Gross Allowed Costs	\$191.3	\$209.7	\$227.4	\$242.0	\$260.3	\$279.3	\$298.6	\$319.4	\$341.3	\$368.6	\$2,737.9

*Note, that the sum of Total Member Costs, Total Government Costs, and Mfr Liability is equal to the sum of Total Gross Allowed Costs and non-benefit expenses minus rebates.
Total Member Costs + Total Government Costs + Mfr Liability = Total Gross Allowed Costs + Non-Benefit Expenses - Rebates.

Appendix B
CSL Behring
Impact of Part D Redesign Scenario Costs - Nationwide Population - Comparison to H.R. 5376
2022 through 2031 (Billions of Dollars)

H.R. 5376											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Total
Member Cost Sharing	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0
Member Premium	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0
Total Member Costs	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0
Reinsurance	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0
Direct Subsidy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0
LICS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0
LIPS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0
Total Government Costs	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0
Manufacturer Liability	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0
Bid Amount	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0
Total Gross Allowed Costs	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	\$0.0
H.R. 5376 with Phase-in to LI - Plasma Therapies (20% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Total
Member Cost Sharing	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Member Premium	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.1
Total Member Costs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.1
Reinsurance	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Direct Subsidy	\$0.0	\$0.0	\$0.1	\$0.1	\$0.1	\$0.1	\$0.1	\$0.1	\$0.0	\$0.0	\$0.7
LICS	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
LIPS	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.1
Total Government Costs	\$0.0	\$0.0	\$0.2	\$0.2	\$0.1	\$0.1	\$0.1	\$0.1	\$0.0	\$0.0	\$0.7
Manufacturer Liability	\$0.0	\$0.0	-\$0.2	-\$0.2	-\$0.2	-\$0.1	-\$0.1	-\$0.1	\$0.0	\$0.0	-\$0.9
Bid Amount	\$0.0	\$0.0	\$0.2	\$0.2	\$0.2	\$0.1	\$0.1	\$0.1	\$0.0	\$0.0	\$0.9
Total Gross Allowed Costs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
H.R. 5376 with Phase-in to NLI/LI - Plasma Therapies (20% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Total
Member Cost Sharing	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Member Premium	\$0.0	\$0.0	\$0.1	\$0.1	\$0.1	\$0.1	\$0.0	\$0.0	\$0.0	\$0.0	\$0.3
Total Member Costs	\$0.0	\$0.0	\$0.1	\$0.1	\$0.1	\$0.1	\$0.0	\$0.0	\$0.0	\$0.0	\$0.3
Reinsurance	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Direct Subsidy	\$0.0	\$0.0	\$0.3	\$0.3	\$0.3	\$0.3	\$0.2	\$0.1	\$0.0	\$0.0	\$1.5
LICS	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
LIPS	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.1
Total Government Costs	\$0.0	\$0.0	\$0.3	\$0.3	\$0.3	\$0.3	\$0.3	\$0.1	\$0.0	\$0.0	\$1.7
Manufacturer Liability	\$0.0	\$0.0	-\$0.4	-\$0.4	-\$0.4	-\$0.3	-\$0.3	-\$0.2	\$0.0	\$0.0	-\$2.0
Bid Amount	\$0.0	\$0.0	\$0.4	\$0.4	\$0.4	\$0.3	\$0.3	\$0.2	\$0.0	\$0.0	\$1.9
Total Gross Allowed Costs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
H.R. 5376 with Phase-in to LI - Plasma Therapies (10% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Total
Member Cost Sharing	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Member Premium	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.2
Total Member Costs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.2
Reinsurance	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Direct Subsidy	\$0.0	\$0.0	\$0.1	\$0.1	\$0.1	\$0.1	\$0.1	\$0.1	\$0.2	\$0.2	\$1.2
LICS	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
LIPS	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.1
Total Government Costs	\$0.0	\$0.0	\$0.2	\$0.2	\$0.1	\$0.1	\$0.1	\$0.2	\$0.2	\$0.2	\$1.3
Manufacturer Liability	\$0.0	\$0.0	-\$0.2	-\$0.2	-\$0.2	-\$0.1	-\$0.1	-\$0.2	-\$0.3	-\$0.3	-\$1.5
Bid Amount	\$0.0	\$0.0	\$0.2	\$0.2	\$0.2	\$0.1	\$0.1	\$0.2	\$0.2	\$0.3	\$1.5
Total Gross Allowed Costs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
H.R. 5376 with Phase-in to NLI/LI - Plasma Therapies (10% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Total
Member Cost Sharing	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Member Premium	\$0.0	\$0.0	\$0.1	\$0.1	\$0.1	\$0.1	\$0.0	\$0.1	\$0.1	\$0.1	\$0.5
Total Member Costs	\$0.0	\$0.0	\$0.1	\$0.1	\$0.1	\$0.1	\$0.0	\$0.1	\$0.1	\$0.1	\$0.5
Reinsurance	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Direct Subsidy	\$0.0	\$0.0	\$0.3	\$0.3	\$0.3	\$0.3	\$0.2	\$0.3	\$0.4	\$0.4	\$2.5
LICS	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
LIPS	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.2
Total Government Costs	\$0.0	\$0.0	\$0.3	\$0.3	\$0.3	\$0.3	\$0.3	\$0.3	\$0.4	\$0.4	\$2.7
Manufacturer Liability	\$0.0	\$0.0	-\$0.4	-\$0.4	-\$0.4	-\$0.3	-\$0.3	-\$0.4	-\$0.5	-\$0.5	-\$3.2
Bid Amount	\$0.0	\$0.0	\$0.4	\$0.4	\$0.4	\$0.3	\$0.3	\$0.4	\$0.5	\$0.5	\$3.1
Total Gross Allowed Costs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0

*Note, that the sum of Total Member Costs, Total Government Costs, and Mfr Liability is equal to the sum of Total Gross Allowed Costs and non-benefit expenses minus rebates.
Total Member Costs + Total Government Costs + Mfr Liability = Total Gross Allowed Costs + Non-Benefit Expenses - Rebates.

Appendix C
CSL Behring
Part D Redesign Scenario Per Member Per Year Costs - Nationwide
2022 through 2031

H.R. 5376											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Average
Member Cost Sharing	\$558.4	\$559.8	\$457.1	\$472.9	\$489.3	\$505.7	\$530.0	\$547.5	\$558.4	\$579.6	\$526.7
Member Premium	\$281.9	\$304.3	\$338.2	\$347.0	\$358.2	\$370.5	\$385.6	\$397.4	\$406.7	\$423.2	\$364.0
Total Member Costs	\$840.3	\$864.1	\$795.3	\$819.9	\$847.5	\$876.2	\$915.6	\$944.9	\$965.0	\$1,002.8	\$890.7
Reinsurance	\$1,112.0	\$1,181.0	\$380.9	\$392.8	\$413.3	\$435.2	\$459.6	\$484.9	\$511.2	\$536.6	\$580.3
Direct Subsidy	\$73.0	\$96.2	\$1,230.0	\$1,253.9	\$1,287.7	\$1,322.1	\$1,355.8	\$1,385.1	\$1,417.5	\$1,470.5	\$1,115.0
LICS	\$735.7	\$754.5	\$267.7	\$279.6	\$291.9	\$304.3	\$307.7	\$320.4	\$343.8	\$361.0	\$389.9
LIPS	\$118.5	\$127.1	\$139.8	\$141.6	\$146.7	\$151.2	\$157.3	\$162.0	\$166.2	\$172.9	\$149.4
Total Government Costs	\$2,039.2	\$2,158.9	\$2,018.4	\$2,067.8	\$2,139.6	\$2,212.8	\$2,280.4	\$2,352.3	\$2,438.7	\$2,541.1	\$2,234.6
Manufacturer Liability	\$227.7	\$240.0	\$594.5	\$620.9	\$671.3	\$725.7	\$778.4	\$847.6	\$922.6	\$971.9	\$674.8
Bid Amount	\$458.2	\$510.6	\$1,653.1	\$1,686.5	\$1,735.0	\$1,784.5	\$1,850.8	\$1,895.3	\$1,926.4	\$2,000.3	\$1,578.8
Total Gross Allowed Costs	\$4,459.2	\$4,713.4	\$4,953.8	\$5,127.1	\$5,378.4	\$5,641.9	\$5,912.7	\$6,202.5	\$6,512.6	\$6,838.2	\$5,621.2
H.R. 5376 with Phase-in to LI - Plasma Therapies (20% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Average
Member Cost Sharing	\$558.4	\$559.8	\$457.1	\$472.9	\$489.3	\$505.7	\$530.0	\$547.5	\$558.4	\$579.6	\$526.7
Member Premium	\$281.9	\$304.3	\$338.8	\$347.6	\$358.8	\$371.0	\$386.1	\$397.6	\$406.7	\$423.2	\$364.3
Total Member Costs	\$840.3	\$864.1	\$796.0	\$820.5	\$848.1	\$876.7	\$916.1	\$945.1	\$965.0	\$1,002.8	\$891.0
Reinsurance	\$1,112.0	\$1,181.0	\$380.9	\$392.8	\$413.3	\$435.2	\$459.6	\$484.9	\$511.2	\$536.6	\$580.3
Direct Subsidy	\$73.0	\$96.2	\$1,233.1	\$1,256.8	\$1,290.5	\$1,324.4	\$1,357.9	\$1,386.1	\$1,417.5	\$1,470.5	\$1,116.4
LICS	\$735.7	\$754.5	\$267.7	\$279.6	\$291.9	\$304.3	\$307.7	\$320.4	\$343.8	\$361.0	\$389.9
LIPS	\$118.5	\$127.1	\$140.1	\$141.9	\$146.9	\$151.4	\$157.5	\$162.1	\$166.2	\$172.9	\$149.5
Total Government Costs	\$2,039.2	\$2,158.9	\$2,021.7	\$2,071.1	\$2,142.6	\$2,215.3	\$2,282.7	\$2,353.5	\$2,438.7	\$2,541.1	\$2,236.2
Manufacturer Liability	\$227.7	\$240.0	\$590.5	\$616.9	\$667.8	\$722.7	\$775.7	\$846.2	\$922.6	\$971.9	\$673.0
Bid Amount	\$458.2	\$510.6	\$1,657.0	\$1,690.2	\$1,738.4	\$1,787.4	\$1,853.4	\$1,896.6	\$1,926.4	\$2,000.3	\$1,580.5
Total Gross Allowed Costs	\$4,459.2	\$4,713.4	\$4,953.8	\$5,127.1	\$5,378.4	\$5,641.9	\$5,912.7	\$6,202.5	\$6,512.6	\$6,838.2	\$5,621.2
H.R. 5376 with Phase-in to NLI/LI - Plasma Therapies (20% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Average
Member Cost Sharing	\$558.4	\$559.8	\$457.1	\$472.9	\$489.3	\$505.7	\$530.0	\$547.5	\$558.4	\$579.6	\$526.7
Member Premium	\$281.9	\$304.3	\$339.6	\$348.4	\$359.5	\$371.6	\$386.6	\$397.9	\$406.7	\$423.2	\$364.6
Total Member Costs	\$840.3	\$864.1	\$796.8	\$821.3	\$848.8	\$877.3	\$916.6	\$945.4	\$965.0	\$1,002.8	\$891.3
Reinsurance	\$1,112.0	\$1,181.0	\$380.9	\$392.8	\$413.3	\$435.2	\$459.6	\$484.9	\$511.2	\$536.6	\$580.3
Direct Subsidy	\$73.0	\$96.2	\$1,236.9	\$1,260.7	\$1,293.9	\$1,327.3	\$1,360.4	\$1,387.4	\$1,417.5	\$1,470.5	\$1,118.2
LICS	\$735.7	\$754.5	\$267.7	\$279.6	\$291.9	\$304.3	\$307.7	\$320.4	\$343.8	\$361.0	\$389.9
LIPS	\$118.5	\$127.1	\$140.4	\$142.2	\$147.2	\$151.6	\$157.7	\$162.2	\$166.2	\$172.9	\$149.6
Total Government Costs	\$2,039.2	\$2,158.9	\$2,025.9	\$2,075.2	\$2,146.3	\$2,218.5	\$2,285.5	\$2,354.9	\$2,438.7	\$2,541.1	\$2,238.1
Manufacturer Liability	\$227.7	\$240.0	\$585.6	\$612.0	\$663.5	\$719.1	\$772.4	\$844.5	\$922.6	\$971.9	\$670.7
Bid Amount	\$458.2	\$510.6	\$1,661.8	\$1,695.0	\$1,742.6	\$1,791.0	\$1,856.6	\$1,898.3	\$1,926.4	\$2,000.3	\$1,582.7
Total Gross Allowed Costs	\$4,459.2	\$4,713.4	\$4,953.8	\$5,127.1	\$5,378.4	\$5,641.9	\$5,912.7	\$6,202.5	\$6,512.6	\$6,838.2	\$5,621.2
H.R. 5376 with Phase-in to LI - Plasma Therapies (10% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Average
Member Cost Sharing	\$558.4	\$559.8	\$457.1	\$472.9	\$489.3	\$505.7	\$530.0	\$547.5	\$558.4	\$579.6	\$526.7
Member Premium	\$281.9	\$304.3	\$338.8	\$347.6	\$358.8	\$371.0	\$386.1	\$397.9	\$407.4	\$424.1	\$364.5
Total Member Costs	\$840.3	\$864.1	\$796.0	\$820.5	\$848.1	\$876.7	\$916.1	\$945.5	\$965.8	\$1,003.6	\$891.2
Reinsurance	\$1,112.0	\$1,181.0	\$380.9	\$392.8	\$413.3	\$435.2	\$459.6	\$484.9	\$511.2	\$536.6	\$580.3
Direct Subsidy	\$73.0	\$96.2	\$1,233.1	\$1,256.8	\$1,290.5	\$1,324.4	\$1,357.9	\$1,387.8	\$1,421.1	\$1,474.5	\$1,117.4
LICS	\$735.7	\$754.5	\$267.7	\$279.6	\$291.9	\$304.3	\$307.7	\$320.4	\$343.8	\$361.0	\$389.9
LIPS	\$118.5	\$127.1	\$140.1	\$141.9	\$146.9	\$151.4	\$157.5	\$162.2	\$166.5	\$173.3	\$149.6
Total Government Costs	\$2,039.2	\$2,158.9	\$2,021.7	\$2,071.1	\$2,142.6	\$2,215.3	\$2,282.7	\$2,353.5	\$2,442.6	\$2,545.3	\$2,237.2
Manufacturer Liability	\$227.7	\$240.0	\$590.5	\$616.9	\$667.8	\$722.7	\$775.7	\$844.0	\$917.8	\$966.8	\$671.7
Bid Amount	\$458.2	\$510.6	\$1,657.0	\$1,690.2	\$1,738.4	\$1,787.4	\$1,853.4	\$1,898.8	\$1,930.9	\$2,005.2	\$1,581.8
Total Gross Allowed Costs	\$4,459.2	\$4,713.4	\$4,953.8	\$5,127.1	\$5,378.4	\$5,641.9	\$5,912.7	\$6,202.5	\$6,512.6	\$6,838.2	\$5,621.2
H.R. 5376 with Phase-in to NLI/LI - Plasma Therapies (10% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Average
Member Cost Sharing	\$558.4	\$559.8	\$457.1	\$472.9	\$489.3	\$505.7	\$530.0	\$547.5	\$558.4	\$579.6	\$526.7
Member Premium	\$281.9	\$304.3	\$339.6	\$348.4	\$359.5	\$371.6	\$386.6	\$398.6	\$408.1	\$424.8	\$365.0
Total Member Costs	\$840.3	\$864.1	\$796.8	\$821.3	\$848.8	\$877.3	\$916.6	\$946.1	\$966.5	\$1,004.4	\$891.7
Reinsurance	\$1,112.0	\$1,181.0	\$380.9	\$392.8	\$413.3	\$435.2	\$459.6	\$484.9	\$511.2	\$536.6	\$580.3
Direct Subsidy	\$73.0	\$96.2	\$1,236.9	\$1,260.7	\$1,293.9	\$1,327.3	\$1,360.4	\$1,390.7	\$1,424.4	\$1,478.0	\$1,120.1
LICS	\$735.7	\$754.5	\$267.7	\$279.6	\$291.9	\$304.3	\$307.7	\$320.4	\$343.8	\$361.0	\$389.9
LIPS	\$118.5	\$127.1	\$140.4	\$142.2	\$147.2	\$151.6	\$157.7	\$162.5	\$166.8	\$173.6	\$149.6
Total Government Costs	\$2,039.2	\$2,158.9	\$2,025.9	\$2,075.2	\$2,146.3	\$2,218.5	\$2,285.5	\$2,358.5	\$2,446.2	\$2,549.2	\$2,240.1
Manufacturer Liability	\$227.7	\$240.0	\$585.6	\$612.0	\$663.5	\$719.1	\$772.4	\$840.2	\$913.6	\$962.3	\$668.3
Bid Amount	\$458.2	\$510.6	\$1,661.8	\$1,695.0	\$1,742.6	\$1,791.0	\$1,856.6	\$1,902.5	\$1,935.0	\$2,009.6	\$1,585.1
Total Gross Allowed Costs	\$4,459.2	\$4,713.4	\$4,953.8	\$5,127.1	\$5,378.4	\$5,641.9	\$5,912.7	\$6,202.5	\$6,512.6	\$6,838.2	\$5,621.2

*Note, that the sum of Total Member Costs, Total Government Costs, and Mfr Liability is equal to the sum of Total Gross Allowed Costs and non-benefit expenses minus rebates.

Total Member Costs + Total Government Costs + Mfr Liability = Total Gross Allowed Costs + Non-Benefit Expenses - Rebates.

**Assumes 12 months per member.

Appendix D
CSL Behring
Impact of Part D Redesign Scenario Per Member Per Year Costs - Nationwide - Comparison to H.R. 5376
2022 through 2031

H.R. 5376											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Average
Member Cost Sharing	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Member Premium	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Member Costs	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Reinsurance	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Direct Subsidy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
LICS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
LIPS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Government Costs	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Manufacturer Liability	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Bid Amount	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Gross Allowed Costs	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
H.R. 5376 with Phase-in to LI - Plasma Therapies (20% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Average
Member Cost Sharing	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Member Premium	\$0.0	\$0.0	\$0.6	\$0.6	\$0.6	\$0.5	\$0.4	\$0.2	\$0.0	\$0.0	\$0.3
Total Member Costs	\$0.0	\$0.0	\$0.6	\$0.6	\$0.6	\$0.5	\$0.4	\$0.2	\$0.0	\$0.0	\$0.3
Reinsurance	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Direct Subsidy	\$0.0	\$0.0	\$3.1	\$3.0	\$2.8	\$2.3	\$2.1	\$1.0	\$0.0	\$0.0	\$1.4
LICS	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
LIPS	\$0.0	\$0.0	\$0.3	\$0.3	\$0.2	\$0.2	\$0.2	\$0.1	\$0.0	\$0.0	\$0.1
Total Government Costs	\$0.0	\$0.0	\$3.3	\$3.2	\$3.0	\$2.5	\$2.3	\$1.1	\$0.0	\$0.0	\$1.5
Manufacturer Liability	\$0.0	\$0.0	-\$4.0	-\$3.9	-\$3.5	-\$3.0	-\$2.6	-\$1.4	\$0.0	\$0.0	-\$1.8
Bid Amount	\$0.0	\$0.0	\$3.8	\$3.7	\$3.5	\$2.9	\$2.6	\$1.3	\$0.0	\$0.0	\$1.8
Total Gross Allowed Costs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
H.R. 5376 with Phase-in to NLI/LI - Plasma Therapies (20% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Average
Member Cost Sharing	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Member Premium	\$0.0	\$0.0	\$1.4	\$1.4	\$1.3	\$1.1	\$1.0	\$0.5	\$0.0	\$0.0	\$0.7
Total Member Costs	\$0.0	\$0.0	\$1.4	\$1.4	\$1.3	\$1.1	\$1.0	\$0.5	\$0.0	\$0.0	\$0.7
Reinsurance	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Direct Subsidy	\$0.0	\$0.0	\$6.9	\$6.8	\$6.1	\$5.2	\$4.7	\$2.4	\$0.0	\$0.0	\$3.2
LICS	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
LIPS	\$0.0	\$0.0	\$0.6	\$0.6	\$0.5	\$0.4	\$0.4	\$0.2	\$0.0	\$0.0	\$0.3
Total Government Costs	\$0.0	\$0.0	\$7.5	\$7.4	\$6.7	\$5.6	\$5.1	\$2.6	\$0.0	\$0.0	\$3.4
Manufacturer Liability	\$0.0	\$0.0	-\$8.9	-\$8.8	-\$7.8	-\$6.7	-\$5.9	-\$3.2	\$0.0	\$0.0	-\$4.1
Bid Amount	\$0.0	\$0.0	\$8.6	\$8.5	\$7.7	\$6.5	\$5.9	\$3.0	\$0.0	\$0.0	\$4.0
Total Gross Allowed Costs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
H.R. 5376 with Phase-in to LI - Plasma Therapies (10% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Average
Member Cost Sharing	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Member Premium	\$0.0	\$0.0	\$0.6	\$0.6	\$0.6	\$0.5	\$0.4	\$0.6	\$0.8	\$0.8	\$0.5
Total Member Costs	\$0.0	\$0.0	\$0.6	\$0.6	\$0.6	\$0.5	\$0.4	\$0.6	\$0.8	\$0.8	\$0.5
Reinsurance	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Direct Subsidy	\$0.0	\$0.0	\$3.1	\$3.0	\$2.8	\$2.3	\$2.1	\$2.8	\$3.6	\$3.9	\$2.4
LICS	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
LIPS	\$0.0	\$0.0	\$0.3	\$0.3	\$0.2	\$0.2	\$0.2	\$0.2	\$0.3	\$0.3	\$0.2
Total Government Costs	\$0.0	\$0.0	\$3.3	\$3.2	\$3.0	\$2.5	\$2.3	\$3.0	\$4.0	\$4.3	\$2.6
Manufacturer Liability	\$0.0	\$0.0	-\$4.0	-\$3.9	-\$3.5	-\$3.0	-\$2.6	-\$3.6	-\$4.8	-\$5.1	-\$3.1
Bid Amount	\$0.0	\$0.0	\$3.8	\$3.7	\$3.5	\$2.9	\$2.6	\$3.5	\$4.6	\$4.9	\$3.0
Total Gross Allowed Costs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
H.R. 5376 with Phase-in to NLI/LI - Plasma Therapies (10% Catastrophic)											
Year	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Ten Year Average
Member Cost Sharing	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Member Premium	\$0.0	\$0.0	\$1.4	\$1.4	\$1.3	\$1.1	\$1.0	\$1.2	\$1.4	\$1.6	\$1.1
Total Member Costs	\$0.0	\$0.0	\$1.4	\$1.4	\$1.3	\$1.1	\$1.0	\$1.2	\$1.4	\$1.6	\$1.1
Reinsurance	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
Direct Subsidy	\$0.0	\$0.0	\$6.9	\$6.8	\$6.1	\$5.2	\$4.7	\$5.7	\$6.9	\$7.5	\$5.1
LICS	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0
LIPS	\$0.0	\$0.0	\$0.6	\$0.6	\$0.5	\$0.4	\$0.4	\$0.5	\$0.6	\$0.6	\$0.4
Total Government Costs	\$0.0	\$0.0	\$7.5	\$7.4	\$6.7	\$5.6	\$5.1	\$6.2	\$7.5	\$8.1	\$5.5
Manufacturer Liability	\$0.0	\$0.0	-\$8.9	-\$8.8	-\$7.8	-\$6.7	-\$5.9	-\$7.4	-\$9.0	-\$9.6	-\$6.6
Bid Amount	\$0.0	\$0.0	\$8.6	\$8.5	\$7.7	\$6.5	\$5.9	\$7.2	\$8.6	\$9.4	\$6.4
Total Gross Allowed Costs	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0	\$0.0

*Note, that the sum of Total Member Costs, Total Government Costs, and Mfr Liability is equal to the sum of Total Gross Allowed Costs and non-benefit expenses minus rebates.

Total Member Costs + Total Government Costs + Mfr Liability = Total Gross Allowed Costs + Non-Benefit Expenses - Rebates.

**Assumes 12 months per member.

Appendix E
CSL Behring
Medicare Part D Plasma Products

Therapeutic Class	Product Name
Alpha-Proteinase Inhibitor (Human)	ARALAST NP
Alpha-Proteinase Inhibitor (Human)	GLASSIA
Alpha-Proteinase Inhibitor (Human)	PROLASTIN-C
Alpha-Proteinase Inhibitor (Human)	ZEMAIRA
Antihemophilic Products	ALPHANATE / VON WILLEBRAND FACTOR COMPLEX / HUMAN
Antihemophilic Products	ALPHANINE SD
Antihemophilic Products	BEBULIN
Antihemophilic Products	COAGADEx
Antihemophilic Products	CORIFACT
Antihemophilic Products	FEIBA
Antihemophilic Products	FIBRYGA
Antihemophilic Products	HEMOFIL M
Antihemophilic Products	HUMATE-P
Antihemophilic Products	KCENTRA
Antihemophilic Products	KOATE
Antihemophilic Products	KOATE-DVI
Antihemophilic Products	MONOCLATE-P
Antihemophilic Products	MONONINE
Antihemophilic Products	PROFILNINE
Antihemophilic Products	PROFILNINE SD
Antihemophilic Products	RIASTAP
Antihemophilic Products	WILATE
Hereditary Angioedema Agents	BERINERT
Hereditary Angioedema Agents	CINRYZE
Hereditary Angioedema Agents	HAEGARDA
Immunoglobulins	ASCENIV
Immunoglobulins	BIVIGAM
Immunoglobulins	CARIMUNE NANOFILTERED
Immunoglobulins	CUTAQUIG
Immunoglobulins	CUVITRU
Immunoglobulins	CYTOGAM
Immunoglobulins	FLEBOGAMMA DIF
Immunoglobulins	GAMASTAN
Immunoglobulins	GAMASTAN S/D
Immunoglobulins	GAMMAGARD LIQUID
Immunoglobulins	GAMMAGARD S/D IGA LESS THAN 1MCG/ML
Immunoglobulins	GAMMAKED
Immunoglobulins	GAMMAPLEX
Immunoglobulins	GAMUNEX-C
Immunoglobulins	HEPAGAM B
Immunoglobulins	HIZENTRA
Immunoglobulins	HYPERHEP B S/D
Immunoglobulins	HYPERRAB
Immunoglobulins	HYPERRAB S/D
Immunoglobulins	HYPERRHO S/D
Immunoglobulins	HYPERRHO S/D MINI-DOSE
Immunoglobulins	HYPERTET S/D
Immunoglobulins	HYQVIA
Immunoglobulins	IMOGAM RABIES-HT
Immunoglobulins	KEDRAB
Immunoglobulins	MICRHOGAM ULTRA-FILTERED PLUS
Immunoglobulins	NABI-HB
Immunoglobulins	OCTAGAM
Immunoglobulins	PANZYGA
Immunoglobulins	PRIVIGEN
Immunoglobulins	RHOGAM ULTRA-FILTERED PLUS
Immunoglobulins	RHOPHYLAC
Immunoglobulins	VARIZIG
Immunoglobulins	WINRHO SDF

Appendix E
CSL Behring
Medicare Part D Plasma Products

Immunoglobulins	XEMBIFY
Plasma Proteins	ALBUKED 25
Plasma Proteins	ALBUKED 5
Plasma Proteins	ALBUMIN HUMAN
Plasma Proteins	ALBUMINAR-25
Plasma Proteins	ALBUMINAR-5
Plasma Proteins	ALBUMINEX
Plasma Proteins	ALBUMIN-ZLB
Plasma Proteins	ALBURX
Plasma Proteins	ALBUTEIN
Plasma Proteins	BUMINATE
Plasma Proteins	FLEXBUMIN
Plasma Proteins	HUMAN ALBUMIN GRIFOLS
Plasma Proteins	KEDBUMIN
Plasma Proteins	OCTAPLAS BLOOD GROUP A
Plasma Proteins	OCTAPLAS BLOOD GROUP AB
Plasma Proteins	OCTAPLAS BLOOD GROUP B
Plasma Proteins	OCTAPLAS BLOOD GROUP O
Plasma Proteins	PLASBUMIN-25
Plasma Proteins	PLASBUMIN-5
Plasma Proteins	PLASMANATE
Plasma Proteins	THROMBATE III
Plasma Proteins	THROMBATE III W/10 ML STERILE WATER
Plasma Proteins	THROMBATE III W/20 ML STERILE WATER