

Cost Review Study Report- Ozempic

PDAB Meeting

May 18, 2026

PDAB Staff



MARYLAND

Prescription Drug Affordability Board

Actions Taken As Part of the Cost Review Study Process

- **Board Deliberated on November 17, 2025 and made preliminary determinations**
- **Board Staff prepared a draft cost review study report containing**
 - Summary of Information Considered by the Board
 - Summary of Deliberations
 - Circumstances and Indicia Reflecting the Affordability Challenge
 - Preliminary Determination
- **Draft Posted for Public Comment: April 22, 2026**
 - Comments Due: May 1, 2026
- **Staff Published a Revised Draft on TBD**



Finalizing the Cost Review Study Report

- G. Final Determination Concerning Affordability Challenge and Final Cost Review Study Report.
 - (1) The Board may vote to finalize the preliminary determination and approve the draft cost review report as final.
 - (2) The Board's determination of whether a prescription drug has or will lead to an affordability challenge is not final until the final cost review report is adopted by the Board.
 - (3) The Board shall create and adopt a final report of the cost review study that, to the extent permitted by Health-General Article, §§21-2C-03 and 21-2C-10, Annotated Code of Maryland, summarizes the information considered by the Board in conducting the cost review study, the Board's deliberations, and the Board's determination.



Board Cost Review Tasks for this Meeting

- **Review:** Public comments on draft report
- **Discuss:** Revised draft report
- **Move:** Make Final determination of affordability challenge
- **Deliberate:** Final determination of affordability challenge
- **Vote:** Final affordability challenge determination
 - Staff will update the report to reflect these deliberations
- **Vote:** Adopt final cost review study report



Summary of Comments Received on Draft Report- Ozempic

- Comments were received from the following:
 - AARP
 - Howard County Education Association
 - Novo Nordisk
 - PhRMA
 - Benna Z Sherman, PhD
 - Ruth Stemberger, Ph.D.



Support of Ozempic Findings in the Cost Review Study Report

- **Four commenters noted the importance of findings of the Cost Review Study Report for Ozempic because of the impact that Ozempic has on the health plans and beneficiaries.**
 - **One commenter supported the Board's findings, stating that they discontinued coverage for GLP-1 medications (such as Ozempic/Wegovy) specifically for weight management, "following a surge in costs from \$485,000 to over \$3.6 million quarterly."**

Reponse: The PDAB thanks the commenters for their input

Proposed Updates: No changes.



Need for Certain Definitions

- **Two commenters noted concerns with the standards for making the affordability challenge determination. This includes the circumstances identified by the Board under which the cost of a prescription drug product has led or will lead to affordability challenges for the State health care system and patients without explicitly defining affordability.**

Reponse: The PDAB thanks the commenters for their input. The Board's current process aligns with the requirements. The Board may update the process for future rounds of Cost Review Studies to define and standardize the determination that drugs have led or will lead to an affordability challenge.

Proposed Updates: No changes.



Need for Additional Transparency in the Process

- One commenters noted concerns with transparency in the Cost Review Study Process, including the process for considering data obtained from diverse sources while ensuring accuracy and maintaining confidentiality, as well as identifying therapeutic alternatives.

Reponse: The PDAB thanks the commenters for their input. The Board's current process aligns with the statutory requirements. However, the Board supports a clear and transparent process. In accordance with law, the Board considers confidential, trade-secret, and proprietary information in closed session.

Proposed Updates: No changes.



Clear Process for Accounting for Comments and Stakeholder Input

- **One commenter noted concerns with how comments are being captured and considered as part of the Cost Review Study Process.**

Reponse: The PDAB thanks the commenters for their input. The Board receives and considers all comments and public input collected in the Cost Review Study Process. The Board will continue to look for opportunities to clearly demonstrate how comments are considered.

Proposed Updates: No changes.



Need to Consider Context on Transformative Value

- **One commenter noted that the Board must evaluate the cost of Ozempic in the context of the unique clinical value offered.**

Reponse: The Board considered the comparative effectiveness and the valuable role of glucagon-like peptide-1 (GLP-1) in diabetes care. See Dossier, Factors 2.1, 2.2, 6.4, and 6.5.

Proposed Updates: No changes.



Some Circumstances are Based on Data that Does Not Capture the Full Picture

- One commenter noted that determinations based on WAC and gross spend may not capture the full picture of an affordability challenge because the health system is most affected by the net cost of prescription drugs, after all rebates and discounts.

Reponse: The Board made the determination based on the best available, verifiable data. Because the WAC and gross spend represent real funds moving through the health care system, distortions of these numbers reflect significant adverse impacts to the health system and patient costs.

The Board agrees that the opacity of the prescription drug market is a substantial problem that makes it difficult for a competitive market to function, and for policy makers to get a full picture of the challenges in the system. The Board thanks the stakeholders for providing clarifying information through the Request for Information Process.

Proposed Updates: No changes.



Market Changes that May Impact the Findings of the Cost Review Study

- One commenter noted a number of market updates may impact the Board's affordability challenge preliminary determination. Specifically, the commenter noted that Novo Nordisk entered into an agreement with the White House to provide savings to Medicaid and patients without insurance or inadequate coverage by offering Ozempic for as low as \$199 per month from NovoCare® Pharmacy and other partner direct-to-patient platforms.

Response: The Board made a preliminary determination that use of Ozempic “has led” to an affordability challenge. That determination was based on the data before the Board. The prescription drug market is dynamic and constantly changing, and any findings of the Board will be based on the data available at a specific period of time, here August 1, 2024. The Policy Review Process and the public comment allows for the incorporation of new data for the Board to determine the appropriate policies to address affordability challenges.

Proposed Updates: No changes.



Next Steps

- **Move:** To make final affordability challenge determination (second)
- **Deliberate:** On final affordability challenge determination
 - Staff will draft additional language for final report
- **Vote:** Final affordability challenge determination
 - Staff will update the report to reflect these deliberations
- **Vote:** Adopt the final cost review study report





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