The 2025 Economic Report on U.S. Pharmacies and Pharmacy Benefit Managers

ADAM J. FEIN, PHD

MARCH 2025





Full report available at https://drugch.nl/pharmacy

COPYRIGHT

© 2025 HMP Omnimedia, LLC d/b/a Drug Channels Institute, an HMP Global Company. All rights reserved.

This report is protected by copyright law and may not be copied or otherwise reproduced, repackaged, further transmitted, transferred, disseminated, redistributed, or resold, in whole or in part, in any form or manner or by any means whatsoever, by any person without prior written consent. This report may be cited in commercial documents with full and appropriate attribution. This report is for informational purposes only and is provided "as is" without any express or implied warranty. The analyses in this report are based solely on information and data that are in the public domain. All conclusions, findings, opinions, and recommendations are based on our own experienced and professional judgment and interpretations given the information available. While all information is believed to be reliable at the time of writing, the information provided here is for reference use only and does not constitute the rendering of legal, financial, commercial, or other professional advice by HMP Omnimedia, LLC, Drug Channels Institute, or the author. Any reliance upon the information is at your own risk, and HMP Omnimedia, LLC, and the author shall not be responsible for any liability arising from or related to the use or accuracy of the information in any way. HMP Omnimedia, LLC, and Drug Channels Institute do not make investment recommendations, on this website or otherwise. Nothing in this report should be interpreted as an opinion by HMP Omnimedia, LLC, Drug Channels Institute, or the author on the investment prospects of specific companies.

Drug Channels[®] is a registered trademark of HMP Global.

LICENSE TERMS

This report is protected by copyright law. Unauthorized reproduction or distribution of this report or any portion of it may result in severe civil and criminal penalties and will be prosecuted to the maximum extent of the law. **This report may be cited in commercial documents with full and appropriate attribution. Nothing in the license is intended to reduce, limit, or restrict any rights arising from fair use under copyright law or other applicable laws.**

If you would like to quote from or otherwise cite the report, here is a suggested sample citation: Fein, Adam J., *The 2025 Economic Report on U.S. Pharmacies and Pharmacy Benefit Managers*, Drug Channels Institute, 2025.

The complete End User License Agreement is available at: https://drugch.nl/2025EULA

Please contact us at <u>dcisupport@hmpglobal.com</u> if you would like to upgrade the license after purchase. You will pay only the difference in license fee.

ABOUT THE AUTHOR

Adam J. Fein, Ph.D., is the President of Drug Channels Institute (DCI), an HMP Global company. DCI helps its customers make sense of pharmaceutical economics and the increasingly complex pharmacy distribution and reimbursement system.

Dr. Fein is one of the country's foremost experts on the pharmaceutical industry. He has published hundreds of academic and industry articles. Dr. Fein has contributed to and is regularly quoted in such national publications as *The Wall Street Journal, The New York Times,* and many others.



His popular and influential <u>Drug Channels</u> website is the go-to source for definitive and comprehensive industry analysis, delivered with a witty edge. Drug Channels is the only place where you'll find a serious discussion of PBMs, drug pricing, and pharmacy economics, all explained with humor and a healthy dose of pop culture.

Dr. Fein earned his doctoral degree from the Wharton School of Business at the University of Pennsylvania and his undergraduate degree from Brandeis University. He lives in Philadelphia with his wife and business partner, Paula.

Contact information

Adam J. Fein, Ph.D. Drug Channels Institute, an HMP Global Company 1515 Market Street, Suite 1660 Philadelphia, PA 19102 Website: <u>www.DrugChannelsInstitute.com</u> Email: <u>afein@drugchannels.net</u>

Visit Dr. Fein's Drug Channels website for the latest industry updates:

DRUG CHANNELS Expert Insights on Pharmaceutical Economics and the Drug Distribution System www.DrugChannels.net

ABOUT DRUG CHANNELS INSTITUTE

Drug Channels Institute (DCI), an HMP Global Company, is a leading source of industry research about pharmaceutical economics and the drug distribution system.

DCI hosts live video webinars during which Dr. Fein discusses trends and policies that affect the pharmaceutical industry and its channels. <u>Click here to view our current and previous video</u> webinars.

DCI also combines Dr. Fein's expertise and innovative analysis—such as this 2025 Economic Report on U.S. Pharmacies and Pharmacy Benefit Managers—into interactive e-learning modules that offer your team a thorough grounding in crucial industry topics. <u>Click here to view a module list</u>. These online learning tools explain complex economic and business data and concepts so you can:

- Make better decisions to achieve your business goals
- Improve relationships with key accounts
- Understand your customers, channels, and the economics of the U.S. pharmaceutical industry

To learn more about how Drug Channels Institute can help your business, please contact:

Paula Fein, M.S.Ed. V.P., Business Development Drug Channels Institute, an HMP Global Company 1515 Market Street, Suite 1660 Philadelphia, PA 19102 Website: <u>www.drugchannelsinstitute.com</u> Email: <u>paula@drugchannels.net</u>



DRUG CHANNELS INSTITUTE

An HMP Global Company

INTRODUCTION AND GUIDE TO THE 2025 REPORT

Since the previous edition of this report, pharmacy and healthcare provider markets continued to experience strong revenue growth amidst a turbulent business and political environment. This 2025 edition of our *Economic Report on U.S. Pharmacies and Pharmacy Benefit Managers* delves into all the crucial commercial, political, financial, and legal forces driving change:

- For 2024, total prescription dispensing revenues of retail, mail, long-term care, and specialty pharmacies reached \$683 billion (excluding COVID-19 vaccines). Anti-obesity GLP-1 agonist drugs remained the most significant driver of prescription revenue at retail pharmacies, accounting for more than 80% of dispensing revenue growth for 2024.
- Amidst this strong revenue growth, the retail pharmacy shakeout accelerated. Over the past four years, the three largest drugstore chains have collectively reduced their store counts by nearly 3,000 locations. Competitive pressures have led many regional chains to exit the industry. Meanwhile, the number of independent pharmacies has been surprisingly stable, as store openings counterbalance store closings.
- Pharmacy benefit managers (PBMs) faced growing controversy over their business models. The Federal Trade Commission (FTC) released two interim reports that were extremely critical of the three largest PBMs. The FTC also initiated legal action over the PBMs' role in the insulin market. States continue to pass legislation that regulates and oversees PBMs, while federal legislation remains stalled.
- The large corporations that own the largest PBMs have begun private label distribution of their own pharmaceutical products. Private label versions of Humira biosimilars have preferred position on the PBMs' 2025 formularies, which has accelerated adoption of biosimilars covered by pharmacy benefit plans. Since the previous edition of this report, the FDA has proposed streamlining the approval process for interchangeable biosimilars, which will further grow the biosimilar market.
- Independent PBMs are gaining some marketplace traction with plan sponsors. However, many smaller PBMs still rely on their larger competitors for certain business functions. An emerging group of smaller PBMs are fully or partially owned by health systems.
- Specialty drugs' share of dispensing revenues and payer costs shrank for the second consecutive year, due partly to growth in nonspecialty obesity drugs. Net prices for specialty drugs also declined, due to competition from biosimilars, the entry of generic specialty drugs, and aggressive benefit management tactics.
- List prices for brand-name drugs—which directly impact the revenues and profits of pharmacies and PBMs—grew at mid-single-digit rates. Some manufacturers have sharply

reduced the list prices of currently marketed brand-name drugs, shrinking the gross-tonet pricing gap for these products. Brand-name drugs' net prices continued to decline, as manufacturers' mandatory and voluntary rebates and discounts offset list price growth.

- For 2024, the gross-to-net bubble, which measures total value of rebates and discounts paid by manufacturers, reached \$356 billion for all brand-name drugs. However, the bubble inflated at its slowest rate in at least 10 years, due partly to list price reductions for highly rebated products with substantial gross sales. Multiple factors are altering manufacturers' approaches to brand-name drug pricing and the gross-to-net bubble.
- Patient-paid prescriptions grew as costs continue to be shifted to consumers through deductibles and coinsurance. A small but growing number of pharmacies focus on noninsurance, patient-paid prescriptions. Consumers also relies more on discount cards, which use PBM-backed networks to pass a portion of rebates and network discounts directly to patients at the point of sale. Plan sponsors are expanding their use of patientpaid prescription prices within pharmacy benefits.
- Implementation of the Inflation Reduction Act of 2022 (IRA) has now altered the Medicare Part D program and triggered changes in beneficiary out-of-pocket spending, drug prices, and market access strategies. Industry participants struggled to understand and manage the IRA's intended and unintended consequences.
- U.S. patients' out-of-pocket costs remain bifurcated, based on benefit design, diagnosis, and drug therapy. Some people take inexpensive generic drugs, have generous benefit plans, and can utilize copayment offset programs. However, a small share of people with commercial insurance face high out-of-pocket expenses due to benefit designs with deductibles and coinsurance spending.
- Plan sponsors accelerated their use of novel tools—copay accumulator adjustment, copay maximizers, and alternative funding programs—that allow them to access manufacturers' copayment support and patient assistance programs to offset plans' specialty drug costs. Patient advocacy, manufacturers' tactics, and new state laws are challenging payers' ability to use these tools.
- The 340B Drug Pricing Program and the role of 340B contract pharmacies remained highly controversial. Net drug sales under the 340B programs again expanded at double-digit rates and now exceed net drug sales under the Medicaid outpatient drug program. More than 40 manufacturers have altered their policies regarding 340B discounts available at external pharmacies. These actions have triggered state legislation, accelerated hospital investments in specialty pharmacy operations strategies, and challenged profits at pharmacies and PBMs.

- Retail chains struggled with their investments in healthcare sites that compete directly with urgent care clinics, physician offices, and other healthcare providers. Walgreens and Walmart have exited (or announced plans to sell) their retail health businesses.
- Federal and state governments continued their attempts to implement policies to import drugs originally intended for the Canadian market. However, activity remains stalled, and no major wholesaler is participating in these efforts.
- The U.S. distribution system is on the cusp of final implementation of the Drug Supply Chain Security Act (DSCSA), although the Food and Drug Administration (FDA) has exempted certain DSCSA requirements until as late as November 2026.

Understanding an Evolving Marketplace

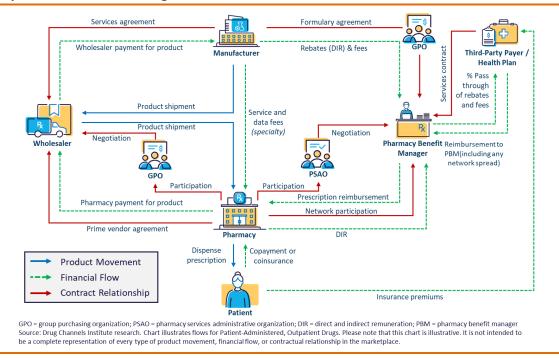
The 2025 Economic Report on U.S. Pharmacies and Pharmacy Benefit Managers—our 15th edition—remains the most comprehensive, fact-based tool for understanding the entire U.S. drug pricing, reimbursement, and dispensing system. This unique, encyclopedic resource is your ultimate guide to the complex web of interactions within U.S. prescription drug channels.

Thousands of companies operate within the U.S. drug channel system, enabling 6.8 billion equivalent prescriptions to be dispensed and paid. The table below highlights the largest public companies that operate in the drug channel, along with their various channel roles. Many of these firms are among the largest businesses on the *Fortune 500* list. Vertical integration has created large companies that participate in a wide range of drug channel activities. Over the past few years, changes in these organizations' vertical strategies are reflected in the exhibit below.

				U.S. drug	channel role			
Company (ticker)	Insurer	Pharmacy benefit manager	Community pharmacy	Mail and/or specialty pharmacy	Healthcare provider	Discount card provider	Group purchasing organization	Wholesaler/ Distributor
Amazon (AMZN)				\checkmark		\checkmark		
Cencora (COR)					\checkmark		\checkmark	\checkmark
Cardinal Health (CAH)					\checkmark		√	✓
Centene (CNC)	✓	✓		\checkmark	\checkmark			
Cigna (CI)	✓	✓		\checkmark	\checkmark	✓	\checkmark	✓
CVS Health (CVS)	\checkmark	✓	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	
Elevance Health (ELV)	\checkmark	✓		\checkmark	\checkmark			
GoodRx (GDRX)						\checkmark		
Humana (HUM)	\checkmark	✓		\checkmark	\checkmark			
Kroger (KR)		✓	✓	\checkmark	\checkmark			
McKesson (MCK)				\checkmark	\checkmark	\checkmark	\checkmark	✓
UnitedHealth Group (UNH)	✓	✓	✓	✓	✓	✓	✓	✓
Walgreens Boots Alliance (WBA)			\checkmark	✓	\checkmark			
Walmart (WMT)			✓	✓				

Major Public Companies Operating in U.S. Drug Channels and Primary Roles

These and other companies discussed in this report operate within a complex distribution, payment, and reimbursement system, illustrated on the next page. It is important to understand that not every product or channel strategy will incorporate every one of these flows.



The U.S. Pharmacy Distribution and Reimbursement System for Patient-Administered, Outpatient Brand-Name Drugs

The 2025 Economic Report on U.S. Pharmacies and Pharmacy Benefit Managers discusses and analyzes the key channel flows illustrated above:

- **Product movement**, which traces shipments from pharmaceutical manufacturers to the drug wholesalers that supply pharmacies. Retail, mail, long-term care, and specialty pharmacies mark the final step, in which a prescription is dispensed to a patient.
- **Financial flows**, which transfer money from third-party payers to PBMs, which in turn reimburse pharmacies. Funds flow to manufacturers via pharmacies, which purchase drugs from wholesalers. Funds flow from manufacturers to PBMs in the form of rebates and fees. The PBMs share most of these payments with plan sponsors, reducing plans' net prescription costs. Manufacturers' payments to PBMs and other third-party payers do not flow through wholesale or retail channels.
- Contractual relationships, which govern the relationships between: 1) payers and PBMs;
 2) PBMs and pharmacies; 3) pharmacies and wholesalers; 4) wholesalers and manufacturers; and 5) manufacturers and PBMs.

In Sections II and III of the report, we revisit this chart to link each flow with the corresponding report chapters that explain and analyze it. This chart appears as <u>Exhibit 69</u> (page 117).

What's New in the 2025 Report

The 2025 Economic Report on U.S. Pharmacies and Pharmacy Benefit Managers is a definitive, nonpartisan report that includes the most current information about pharmacy dispensing channels, third-party payers, PBMs, patients' financial contributions, government regulations, and more. The report synthesizes a wealth of statistical data, research studies, financial information, and my own extensive consulting experience. It will aid pharmaceutical manufacturers, wholesalers, pharmacists, pharmacy owners, hospital executives, pharmacy buyers, benefit managers, managed care executives, policy analysts, investors, consultants, and anyone else who wants to understand and benefit from this ever-changing industry.

The 2025 edition retains the general structure we employed in previous editions. However, we have made some significant structural changes to reflect the industry's evolution. As always, we have updated all market and industry data with the most current information available, including our annual analyses of the market positions of the largest pharmacies, specialty pharmacies, and PBMs. Throughout the report, we have added new industry data, deepened our coverage of many topics, and added more trending information.

The notable new material in this 2025 edition includes the following:

- <u>Section 4.3.</u> has been expanded to provide greater coverage of the growing market for patient-paid prescriptions—cash-pay prescriptions and discount cards. A new <u>Section 4.3.3.</u> has been added to this section to provide a more cohesive review of how and why plan sponsors are utilizing these pricing approaches within pharmacy benefits.
- <u>Section 5.2.3.</u> adds deeper coverage of the smaller PBMs operating in the market. This subsection now distinguishes independent, privately held companies from those partially or fully owned by retail chains and health systems.
- <u>Section 5.4.</u> has been expanded to provide more complete coverage of the various ways by which plan sponsors compensate PBMs.
- A new <u>Section 5.2.5.</u> analyzes the private label business of the vertically integrated organizations that also own the largest pharmacy benefit managers.
- <u>Section 8.4.</u> has been updated and expanded to reflect the emerging importance of acquisition cost as a basis for pharmacy reimbursement. A new <u>Section 8.4.3.</u> has been added to this section to better explain the implications of acquisition cost reimbursement for pharmacies.
- <u>Section 11.4.</u> has been reorganized and streamlined to reflect changes in pharmacy direct and indirect remuneration (DIR) fees in Medicare Part D networks.

- <u>Section 12.3.1.</u> contains a revised analysis of controversies over vertical integration in the drug channel. It also includes a fully updated illustration of these organizations.
- A new <u>Section 12.3.4.</u> reviews how specialty pharmacies are participating in the emerging gene therapy market.
- We have added significant new material to the sections that discuss the Inflation Reduction Act of 2022. These include an expanded and updated <u>Section 12.4.1.</u>, which summarizes the key provisions of the law and current guidance for Medicare Part B and Part D, and <u>Section 12.4.2.</u>, which highlights current impacts and future implications of the IRA for the drug channel.
- Certain material has been shifted from stand-alone sections and integrated into various sections throughout the report. This content includes Amazon's various roles in the pharmacy industry and our discussions of venture-backed pharmacies. <u>Section 1.4.3.</u> now incorporates material on pharmacies' COVID-19 vaccination activity that had previously been presented in its own section.
- Where relevant, we have incorporated data and material from the FTC's two interim reports on the three largest PBMs. Financial exhibits drawn from these reports are included in <u>Section 7.3.1.</u> and <u>Section 12.2.3.</u>
- There are 267 exhibits in the 2025 edition, compared with 262 in the 2024 edition. Nearly all of the exhibits contain updated data or information that was not presented in previous editions of this report.

Structure of the 2025 Report

This report analyzes the industry in three major sections, comprising 12 total chapters:

SECTION I: THE U.S. PHARMACY INDUSTRY

- <u>Chapter 1: Industry Overview</u> (page 13) defines the industry and its regulatory framework, describes the different products and prescriptions that a pharmacy dispenses, provides data on traditional and specialty prescription costs, delineates the various pharmacy industry participants, and quantifies differences among dispensing formats. This chapter includes our analysis of pharmacist-provided clinical services (including medication therapy management services), retail healthcare services, and immunization and vaccine administration.
- <u>Chapter 2: Pharmacy Industry Market Structure</u> (page 50) analyzes the industry's prescription and revenue growth trends. It identifies the largest pharmacies based on prescription revenues. It then analyzes recent market share trends for each dispensing format and for the major national companies.

• <u>Chapter 3: Specialty Drugs and Specialty Pharmacies</u> (page 74) provides a comprehensive overview of the pharmacies dispensing specialty medications. It includes our exclusive analyses of national market share for pharmacy-dispensed specialty drugs and accreditation trends among pharmacies. It also provides a competitive analysis of the various organizations that compete to dispense specialty medications. The chapter reviews the channel strategies that pharmaceutical manufacturers use for specialty drugs, provides our exclusive analyses of limited and exclusive specialty dispensing networks, explains the role of service fees, and profiles the specialty hub services market.

SECTION II: THIRD-PARTY PAYMENT AND PHARMACY BENEFITS

- <u>Chapter 4: Payment and Spending for Prescription Drugs</u> (page 118) examines the primary payers for prescription drugs at retail, mail, long-term care, and specialty pharmacies. It analyzes recent changes in the payer mix and spending on traditional vs. specialty drugs. Chapter 4 also reviews patient-paid prescriptions using cash-pay pharmacies and discount card programs.
- <u>Chapter 5: Pharmacy Benefit Management</u> (page 145) identifies the services and roles of PBMs, analyzes the structure of the PBM industry, reviews the business strategies of the largest PBMs, profiles many smaller PBMs, and discusses PBM-owned purchasing organizations and PBM-affiliated private label products. It describes the relationship between PBMs and the pharmacies that participate in a PBM's network, explains the largest pharmacy services administrative organizations (PSAOs) and identifies the largest players, and details how plan sponsors compensate PBMs for benefit management services. Chapter 5 also reviews the primary sources of PBM compensation by plan sponsors, including spread pricing and pass-through models.
- <u>Chapter 6: Consumer Copayments and Coinsurance</u> (page 198) analyzes the benefit designs and plan structures that determine patients' out-of-pocket spending for the major third-party payers: employer-sponsored health plans, health insurance marketplace plans, Medicare Part D, and Medicaid. We explore manufacturers' out-of-pocket payment support programs, explain the emergence and use of copay accumulators and maximizers, discuss alternative funding programs (sometimes known as specialty carve-out programs), and provide the latest data on patient out-of-pocket expenses. We also present the latest data on how benefit design affects patients' out-of-pocket costs.
- <u>Chapter 7: Narrow Pharmacy Networks</u> (page 247) analyzes the structure, utilization, and economics of narrow network models. We explain the use and economics of narrow networks for pharmacies in commercial health plans and Medicare Part D. We review mail and retail pharmacies as narrow network options for maintenance prescriptions. This chapter also evaluates the latest data on payer-defined networks for specialty drug dispensing in commercial health plans and for buy-and-bill channels.

SECTION III: DRUG CHANNEL ECONOMICS AND OUTLOOK

- Chapter 8: Prescription Reimbursement by Third-Party Payers (page 278) explains the formulas and methodologies for computing a pharmacy's revenue from brand-name, generic, and specialty prescriptions. It also delves into maximum allowable cost (MAC) prices as well as the regulations and laws related to MAC prices. We also review the economics of mail vs. retail pharmacies for payers and consumers. This chapter compares traditional list price methods with the acquisition-cost reimbursement approaches—such as the use of the National Average Drug Acquisition Cost (NADAC)—now utilized by feefor-service Medicaid programs, commercial payers, and cash-pay pharmacies. The chapter also discusses the implications of acquisition cost reimbursement for pharmacies and plans.
- <u>Chapter 9: Drug Pricing, Rebates, and Payer Costs</u> (page 296) explores rebates in commercial health plans, Medicare Part D, Medicaid, and the Department of Veterans Affairs. It explains how PBMs negotiate with manufacturers, analyzes trends in list and net drug prices, and describes the gross-to-net bubble phenomenon. The chapter explains how plan sponsors use rebates, the role of point-of-sale rebates, and controversies over rebates. The chapter concludes by illustrating how prescription reimbursement, formulary rebates, and consumer copayments affect a plan sponsor's net costs for traditional and specialty prescriptions.
- <u>Chapter 10: Relationships with Pharmaceutical Wholesalers</u> (page 340) explores pharmacies' interactions with their primary wholesale suppliers of drugs. It explains wholesalers' channel roles and services, identifies the largest wholesale suppliers, and analyzes how wholesalers affect pharmacies' acquisition costs for drugs. We present our latest data on pharmacy group purchasing organizations and the generic sourcing relationships between wholesalers and large pharmacies. This material is adapted from our <u>Economic Report on Pharmaceutical Wholesalers and Specialty Distributors</u>.
- <u>Chapter 11: Pharmacy and Prescription Profitability</u> (page 352) unites the reimbursement and cost discussions from Chapter 8 and Chapter 10 by presenting the latest available data on pharmacy and prescription profitability. This chapter documents overall drugstore profitability, pharmacy margins for prescriptions from different dispensing formats, profit differences between brand and generic prescriptions, and the sources of PBMs' gross profits. Chapter 11 also includes material on the direct and indirect remuneration (DIR) fee payments that pharmacies make to PBMs and health plans. Finally, we consider pharmacies' role and profits in the 340B Drug Pricing Program.
- <u>Chapter 12: Outlook and Emerging Trends</u> (page 389) presents the outlook for the pharmacy industry's product mix and revenues in 2029. This chapter also considers the outlook for specialty drugs, including the growth in specialty generic drugs and pharmacy-dispensed biosimilars. We also discuss crucial emerging trends, including vertical

integration, importation, state legislation, controversy over the 340B program, and shakeout and consolidation in retail pharmacy. The final section reviews the Inflation Reduction Act of 2022 and its potential impact on the drug channel.

How to Use the 2025 Report

The chapters are self-contained and do not need to be read in order. We include extensive internal, clickable hyperlinks to help you navigate the entire document and customize it to your specific needs. You can use keyboard shortcuts to return to your previous location in the document. We also encourage you to search the entire PDF document for every occurrence of a word or phrase. The shortcuts and search approach will vary based on your computer platform.

There are nearly 1,200 <u>endnotes</u>, most of which have hyperlinks to original source materials. The report also includes a list of the <u>Acronyms and Abbreviations</u> used within it.

As always, I welcome your feedback. Please contact me if you have any questions or comments about *The 2025 Economic Report on U.S. Pharmacies and Pharmacy Benefit Managers*.

Adam J. Fein March 2025

P.S. Click here for post-publication errata.

CONTENTS

PREFACE: INDUSTRY TRENDS AND KEY REPORT THEMES1
SECTION I: THE U.S. PHARMACY INDUSTRY
Chapter 1: Industry Overview
1.1. Pharmacy Fundamentals
1.1.1. Defining the Practice of Pharmacy13
1.1.2. Pharmacies and the Drug Supply Chain Security Act15
1.2. The Products That Pharmacies Dispense18
1.2.1. Brand vs. Generic Drugs18
1.2.2. Traditional vs. Specialty Drugs22
1.2.3. Top Therapy Classes and Average Prescription Costs
1.3. Pharmacy Industry Participants27
1.3.1. Pharmacy Dispensing Formats27
1.3.2. Differences Among Outpatient Retail Dispensing Formats
1.3.3. Pharmacist Salaries and Employment34
1.4. Healthcare and Clinical Services
1.4.1. Retail Healthcare and Provider Services
1.4.2. Medication Therapy Management (MTM), Clinical Services, and Provider Status41
1.4.3. Immunization, Vaccination, and COVID-19 Vaccines47
Chapter 2: Pharmacy Industry Market Structure
2.1. Industry Trends
2.1.1. Total and 30-Day Equivalent Prescriptions50
2.1.2. Prescription Dispensing Revenues
2.2. National Prescription Dispensing Market Share, by Company
2.3. Trends by Dispensing Format
2.3.1. Long-Term Trends in Revenues and Prescriptions56
2.3.2. Market Changes in 2024
2.3.3. National Retail Chains
2.3.4. Regional Chains and Venture-Backed Digital Pharmacies65
2.3.5. Independent Pharmacies

2.3.6. Mail Pharmacies	
Chapter 3: Specialty Drugs and Specialty Pharmacies	
3.1. Specialty Pharmacies	
3.1.1. Defining Specialty Pharmacy	74
3.1.2. Clinical and Data Services	
3.1.3. Accreditation	
3.2. Specialty Pharmacy Market Structure	
3.2.1. Specialty Pharmacy Industry Market Size	
3.2.2. Number of Accredited Specialty Pharmacies	
3.2.3. National Market Share for Specialty Dispensing, by Company	
3.2.4. Mergers and Acquisitions Among Specialty Pharmacies in 2024	
3.3. Trends by Specialty Dispensing Format	
3.3.1. Overview of the 2024 Marketplace	
3.3.2. Pharmacy Benefit Managers and Health Plans	
3.3.3. Independent Specialty Pharmacies	
3.3.4. Retail Chains	
3.3.5. Hospitals and Health Systems	
3.3.6. Physician Practices	
3.3.7. Pharmaceutical Wholesalers	
3.4. Manufacturer Channel Strategies for Specialty Drugs	
3.4.1. Manufacturer-Defined Dispensing Networks and REMS	
3.4.2. Compensation for Specialty Pharmacy Clinical and Data Services	
3.4.3. Specialty Hub Services and Leading Providers	
SECTION II: THIRD-PARTY PAYMENT AND PHARMACY BENEFITS	
Chapter 4: Payment and Spending for Prescription Drugs	
4.1. U.S. Healthcare Spending	
4.1.1. Enrollment in Health Insurance and COVID-19 Impact	
4.1.2. Prescription Drugs and U.S. Healthcare Spending	
4.2. Payer and Spending Trends	
4.2.1. Payment for Outpatient Prescription Drugs	
4.2.2. Trends in Drug Spending, by Payer	

4.2.3. Trends in Drug Spending: Traditional vs. Specialty	
4.2.4. Deconstructing Changes in Cost vs. Utilization	
4.3. Patient-Paid Prescriptions	
4.3.1. Cash-Pay Prescriptions and Usual & Customary Pricing	
4.3.2. Discount Card Programs	
4.3.3. Patient-Paid Prescriptions Within Pharmacy Benefits	
Chapter 5: Pharmacy Benefit Management	
5.1. Overview of Pharmacy Benefit Management	
5.1.1. Services for Plan Sponsors	
5.1.2. Relationships with Plan Sponsors	
5.1.3. Formulary Development and Management	
5.1.4. Formulary Exclusions	
5.1.5. Utilization Management	
5.2. PBM Industry Structure	
5.2.1. National Market Share, by PBM	
5.2.2. Business Trends for the Largest PBMs	
5.2.3. Independent and Health System Owned PBMs	
5.2.4. PBM Purchasing Groups and GPOs	
5.2.5. PBM-Affiliated Private Label Products	
5.3. Relationships Between PBMs and Pharmacies	
5.3.1. Pharmacy Participation in PBM Networks	
5.3.2. PBM–Pharmacy Negotiations	
5.3.3. Pharmacy Services Administrative Organizations (PSAOs)	
5.4. PBM Compensation by Plan Sponsors	
5.4.1. Spread Pricing Models	
5.4.2. Pass-Through Pricing Models	
Chapter 6: Consumer Copayments and Coinsurance	
6.1. Cost Sharing in Pharmacy Benefit Design	
6.1.1. Employer-Sponsored Health Plans	
6.1.2. Health Insurance Marketplace Plans	
6.1.3. Medicare Part D	

6.1.4. Medicaid	216
6.2. Manufacturer Out-of-Pocket Payment Support and Plan Sponsor Strategies	217
6.2.1. Copayment Offset Programs and Patient Assistance Programs	217
6.2.2. Copay Accumulator Adjustment and Copay Maximizers	224
6.2.3. Alternative Funding Programs	231
6.3. Out-of-Pocket Expenses	234
6.3.1. Actual Patient Out-of-Pocket Spending on Prescriptions	234
6.3.2. Consequences of Pharmacy Benefit Designs	239
Chapter 7: Narrow Pharmacy Networks	247
7.1. Overview of Pharmacy Benefit Network Models	247
7.1.1. Network Options	247
7.1.2. The Economics of Narrow Pharmacy Networks	249
7.1.3. Legal and Regulatory Restrictions on Network Design	251
7.2. Retail Pharmacy Networks	252
7.2.1. Preferred Retail Networks in Medicare Part D	252
7.2.2. Narrow Retail Networks in Commercial and Other Plans	259
7.2.3. Narrow Networks for Maintenance Prescriptions	262
7.3. Payer-Defined Specialty Dispensing Networks	265
7.3.1. Commercial Health and Medicare Part D Plans	
7.3.2. Specialty Pharmacies' Role in Buy-and-Bill Channels	268
SECTION III: DRUG CHANNEL ECONOMICS AND OUTLOOK	
Chapter 8: Prescription Reimbursement by Third-Party Payers	278
8.1. The Basics of Prescription Reimbursement	278
8.1.1. Estimated Acquisition Cost (EAC)	278
8.1.2. Dispensing Fees	
8.1.3. Service and Data Fees	
8.2. Reimbursement for Brand-Name and Specialty Prescriptions	
8.2.1. Wholesale Acquisition Cost (WAC) and Average Wholesale Price (AWP) List Prices	282
8.2.2. AWP Discounts for Pharmacy Reimbursement in 2024	
8.2.3. Why Mail Pharmacies Accept Lower Reimbursements	
8.3. Reimbursement for Generic Prescriptions	286

	8.3.1. AWP Discounts for Generic Prescriptions in 2023	286
	8.3.2. Maximum Allowable Cost (MAC) Limits and Generic Effective Rate (GER)	288
	8.3.3. Regulations and Laws Regarding MAC Limits	289
	8.3.4. Medicaid and Federal Upper Limits	290
8	.4. Acquisition Cost Reimbursement	291
	8.4.1. Fee-for-Service Medicaid	291
	8.4.2. Commercial Payers and Cash-Pay Pharmacies	294
	8.4.3. Implications of Acquisition Cost Reimbursement for Pharmacies	296
Cha	pter 9: Drug Pricing, Rebates, and Payer Costs	300
9	.1. Rebates to Third-Party Payers	300
	9.1.1. How Commercial Payers Access Rebates	300
	9.1.2. Rebates, DIR, and Coverage Gap Discounts in Medicare Part D	306
	9.1.3. The Medicaid Drug Rebate Program	311
	9.1.4. Department of Veterans Affairs	315
9	.2. Gross and Net Drug Pricing	316
	9.2.1. List vs. Net Drug Prices	316
	9.2.2. The Gross-to-Net Bubble in 2024	321
9	.3. Issues with the Rebate System	326
	9.3.1. How Plan Sponsors Use Rebates	326
	9.3.2. Point-of-Sale (POS) Rebates	328
	9.3.3. Controversies over Rebates and Rebate Reform	330
	.4. How Prescription Reimbursement, Formulary Rebates, Consumer Copayments, and PBM	
	xpenses Affect Plan Sponsor Costs	
	pter 10: Relationships with Pharmaceutical Wholesalers	
1	0.1. Overview of Wholesale Drug Channels	340
	10.1.1. Industry Participants	340
	10.1.2. Product Distribution	341
	10.1.3. Financial Intermediation	342
	10.1.4. Other Services for Pharmacies, Providers, and Manufacturers	
	10.1.5. Impact on Pharmacy Reimbursement	344
1	0.2. Determinants of Pharmacies' Acquisition Costs	345

10.2.1. Wholesaler Pricing of Brand-Name Drugs to Pharmacies	
10.2.2. Pharmacy Group Purchasing Organizations	347
10.2.3. Generic Sourcing Relationships Between Wholesalers and Large Pharmacies	349
Chapter 11: Pharmacy and Prescription Profitability	
11.1. Overall Drugstore Gross Margins	352
11.1.1. Industry Averages	352
11.1.2. Chain Drugstores	354
11.2. Pharmacy Per-Prescription Profits	
11.2.1. Sources of Per-Prescription Profits	355
11.2.2. Average Per-Prescription Profits for Pharmacies	358
11.2.3. PBM Gross Profits from Network and PBM-Owned Pharmacies	
11.2.4. The Impact of Brand-Name Inflation on Prescription Profits	
11.3. Life Cycle Profitability for Generic Prescriptions	
11.4. Payments from Pharmacies to PBMs	
11.4.1. Pharmacy Performance Fees in PBM Networks	
11.4.2. Pharmacy DIR Fees in Medicare Part D Networks	371
11.5. Pharmacy Profits from the 340B Drug Pricing Program	
11.5.1. Overview of the 340B Program and Drug Prices	
11.5.2. Companies Participating as 340B Contract Pharmacies	
11.5.3. Flow of Funds for a 340B Contract Pharmacy Network	
11.5.4. Third-Party Administrators of 340B Contract Pharmacy Services	
11.5.5. Pharmacy and Covered Entity Profits from 340B Prescriptions	
Chapter 12: Outlook and Emerging Trends	
12.1. Drug Prices and Payment	
12.1.1. The Outlook for Brand-Name List Drug Prices and the Gross-To-Net Bubble	
12.1.2. The Outlook for Generic Drug Prices	
12.1.3. Spending and Payment Projections for Outpatient Prescription Drugs to 2029.	
12.2. The Outlook for Specialty Drugs	
12.2.1. 2024 Update on the Biosimilar Market	
12.2.2. Biosimilars Under the Pharmacy Benefit	401
12.2.3. The Growth and Profitability of Specialty Generic Drugs	406

12.2.4. The Outlook for Pharmacy Revenues to 2029	409
12.3. Emerging Trends	412
12.3.1. Vertical Integration in the Drug Channel: Trends and Controversies	412
12.3.2. Importation From Canada	415
12.3.3. State Legislation of the Drug Channel	418
12.3.4. Specialty Pharmacies' Role in Gene Therapy Channels	422
12.3.5. Business and Legislative Trends for 340B Contract Pharmacies	424
12.3.6. Shakeout and Consolidation in Retail Pharmacy	429
12.4. The Inflation Reduction Act of 2022	433
12.4.1. Key Provisions of the IRA for Medicare Parts B and D	433
12.4.2. Drug Channel Impact and Implications of the IRA	438
Acronyms and Abbreviations	450
Endnotes	452

LIST OF EXHIBITS

Exhibit 1: Timeline of DSCSA Requirements for Pharmacies (Dispensers) and Wholesale Distributors, 2013 to 20	
Exhibit 2: Unbranded and Branded Generics, Share of U.S. Prescriptions, 2003 to 2024	19
Exhibit 3: State Generic Substitution Policies	20
Exhibit 4: Dispense As Written (DAW) Product Selection Codes	20
Exhibit 5: Top Traditional Therapy Categories, Generic Drugs as a Share of Prescriptions and Spending, 2024	21
Exhibit 6: Specialty Prescriptions, Number and Share of Total, 2020 to 2024	22
Exhibit 7: Factors Determining the Classification of a Specialty Drug, By PBM, 2024	24
Exhibit 8: Formulary Agreement on Specialty Drug Classification, by PBM, 2023	24
Exhibit 9: Top Therapy Categories, Share of Non-Discounted Purchases and Average Brand-Name and Generic Prescription Costs, 2024	26
Exhibit 10: Average Annual Number of Prescriptions per Pharmacy, by Retail Dispensing Format, 2024	30
Exhibit 11: Average Annual Prescription Revenue per Pharmacy Outlet, by Retail Dispensing Format, 2024	31
Exhibit 12: Top Four Reasons for Pharmacy Selection, by Dispensing Format	31
Exhibit 13: Average Number of Retail Pharmacies per County, by Dispensing Format and Degree of Urbanizatio	
2020	
Exhibit 14: Pharmacist Work Activities, by Practice Setting, 2022	33
Exhibit 15: Customer Satisfaction with Pharmacies, by Dispensing Format and Company, 2024	33
Exhibit 16: Customer Satisfaction with Pharmacies, By Dispensing Format, 2022 vs. 2024	
Exhibit 17: Pharmacist Employment and Salary, by Practice Setting, 2023	
Exhibit 18: Share of Pharmacist Employment, by Industry, 2013 to 2033	
Exhibit 19: Pharmacists and Healthcare Workers, Change in Annual Average Salary, by Employer, 2014 to 2023	
Exhibit 20: Coverage for Retail Clinics by Employer-Sponsored Plans, 2010 to 2023	38
Exhibit 21: Consumer Views on Products and Services Associated with Retail Stores or Pharmacies, 2024	41
Exhibit 22: Providers of Medication Therapy Management Services, Medicare Part D	42
Exhibit 23: Completion Rate of Medication Therapy Management Services, Medicare Part D, by Plan Type, 2020 2024	
Exhibit 24: Current Procedural Terminology (CPT) Codes Used by Pharmacists	44
Exhibit 25: Consumers' Level of Trust in Pharmacists to Perform Various Healthcare Services	
Exhibit 26: CPESN Networks and Pharmacies, 2018 to 2024	47
Exhibit 27: Adult Influenza Vaccines Administered, Pharmacies vs. Physician Offices, 2019–20 to 2024-25 Seaso	
Exhibit 28: Total U.S. Pharmacy Industry Prescription Revenues, Prescriptions, and Locations, by Dispensing Format, 2024	50
Exhibit 29: Prescriptions, Annual Total and Growth, 2020 to 2024	
Exhibit 30: 30-Day Equivalent Prescriptions, Annual Total and Growth, 2020 to 2024	

Exhibit 31: 90-Day Prescriptions as a Percentage of Total Prescriptions, by Dispensing Format, 2017 to 2024	52
Exhibit 32: Pharmacy Industry Prescription Dispensing Revenues, Annual Total and Growth, 2020 to 2024	53
Exhibit 33: Prescription Dispensing Revenues from GLP-1 Products, By Dispensing Format, 2020 to 2024	54
Exhibit 34: Largest 15 U.S. Pharmacies, by Total Prescription Revenues, 2024	55
Exhibit 35: Total Change in 30-Day Equivalent Prescriptions Dispensed and Prescription Revenues, by Pharmacy	Y
Type, 2014 vs. 2024	56
Exhibit 36: 30-Day Equivalent Prescriptions Dispensed per Location, by Dispensing Format, 2010 to 2024	57
Exhibit 37: Number of 30-Day Equivalent Prescriptions, by Dispensing Format, 2023 vs. 2024	58
Exhibit 38: Prescription Dispensing Revenues, by Dispensing Format, 2023 vs. 2024	58
Exhibit 39: Year-over-Year Change in Same-Store Prescription Count, by Chain, 2020 to 2024	60
Exhibit 40: Largest Regional Chain Drugstores, by Total Prescription Revenues, 2024	65
Exhibit 41: Number of Independent Pharmacies, 2001 to 2023	67
Exhibit 42: Wholesaler-Owned Pharmacy Franchise and Marketing Groups, 2024	67
Exhibit 43: U.S. Pharmacy Franchise Locations, by Company, 2015 to 2024	68
Exhibit 44: Customer Satisfaction with Mail Pharmacies, by Company, 2024	71
Exhibit 45: Share of Mail Pharmacy Dispensing Revenues, by Company, 2024	72
Exhibit 46: Importance of Specialty Pharmacy Services to Patients	76
Exhibit 47: Specialty Prescription Dispensing Revenues, Annual Total and Growth, 2020 to 2024	79
Exhibit 48: Specialty Prescription Dispensing Revenues as a Percentage of Total, 2013 to 2024	80
Exhibit 49: Specialty Drugs as a Percentage of Payers' Pharmacy Benefit Spending, by PBM, 2021 vs. 2023	81
Exhibit 50: Number of Pharmacy Locations with Specialty Pharmacy Accreditation, by Organization, 2015 to 20	2482
Exhibit 51: Locations with URAC Specialty Pharmacy Accreditation, 2008 to 2024	83
Exhibit 52: Prescription Revenues and Market Share from Specialty Pharmaceuticals, by Company, 2023	84
Exhibit 53: Merger and Acquisition Transactions, Specialty Pharmacy and Related Services, 2014 to 2024	84
Exhibit 54: Pharmacy Locations with Specialty Pharmacy Accreditation, by Corporate Ownership, 2024	86
Exhibit 55: Hospitals and Health System Pharmacy Locations With Specialty Pharmacy Accreditation, 2017 to 20	024
	87
Exhibit 56: Specialty Drug Prescription Revenues, by Dispensing Format, 2024	88
Exhibit 57: Retail Companies with Specialty Pharmacy Businesses, 2024	94
Exhibit 58: Hospital and Clinic Share of Oral Oncology Market, 2017 to 2024	98
Exhibit 59: Hospitals' Perceived Barriers to Accessing Specialty Pharmacy Networks, 2020 vs. 2022	99
Exhibit 60: Initial and Final Prescription Claim Status for Brand-Name Oral Oncology Therapies, by Site of	
Dispensing, 2023	100
Exhibit 61: Physician Employment, by Practice Ownership, 2012 vs. 2022	101
Exhibit 62: Share of Oncologists in Practices with Medically Integrated Dispensing, by Practice Setting, 2010 to	
2024	
Exhibit 63: Specialty Pharmacy Network Size, by Number of Pharmacies, 2025	
Exhibit 64: Specialty Pharmacy Networks, Participation Rate by Company, 2025	109

Exhibit 65: Participation in Exclusive Specialty Pharmacy Networks, by Company, 2025	110
Exhibit 66: Frequency of Manufacturer Contracting for Specialty Pharmacy Services, by Type of Service	113
Exhibit 67: Example of Specialty Hub Workflow	114
Exhibit 68: Leading Specialty Hub Services Providers and Ownership, 2024	116
Exhibit 69: Chapter Coverage of Flows in the U.S. Distribution and Reimbursement System	117
Exhibit 70: Comprehensive Health Insurance Enrollment, by Payer, 2021 to 2023	118
Exhibit 71: Medicaid Enrollment, 2005 to 2024E	119
Exhibit 72: Number of Covered Lives, By Insurer and Payer, 2024	120
Exhibit 73: Share of U.S. National Health Expenditures, by Category, 2023	121
Exhibit 74: Share of U.S. National Health Expenditures, by Major Spending Category, 1983 to 2023	122
Exhibit 75: Growth Rate in U.S. National Health Expenditures, by Major Spending Category, 2010 to 2023	123
Exhibit 76: Outpatient Prescription Drug Expenditures, by Source of Payment, 2023	123
Exhibit 77: Outpatient Prescription Drugs as a Share of Payer's Total Health Expenditures, by Payer, 2005 to 20	
Exhibit 78: Share of Outpatient Prescription Drug Dispensing, by Source of Payment, 2023	
Exhibit 79: Prescription Expenses per Person, by Age, 2022	125
Exhibit 80: Prescription Drug Utilization Among Seniors, 1988 to 2020	126
Exhibit 81: Change in Net Spending for Outpatient Prescription Drugs, by Payer, 2022 vs. 2023	126
Exhibit 82: Total Expenditures and Consumer Out-of-Pocket Spending for Hospital Care vs. Prescription Drugs,	, 2023
	128
Exhibit 83: Change in Commercial Payer Net Drug Spending, Traditional vs. Specialty Drugs, 2014 to 2023	129
Exhibit 84: Change in Commercial Payer Net Drug Spending, Traditional vs. Specialty Drugs, by PBM, 2023	130
Exhibit 85: Components of Change in Outpatient Prescription Drug Spending, 2018 to 2023	131
Exhibit 86: Components of Change in Commercial Payer Net Specialty Drug Spending, by PBM, 2023	132
Exhibit 87: Cash-Pay Prescriptions as a Share of Total Prescriptions, 2017 to 2024	133
Exhibit 88: Usual & Customary Cash Prescription Prices vs. Pharmacy Acquisition Costs, Generic and Brand-Na	
Drugs, 2014 vs. 2019	
Exhibit 89: Venture Capital-Backed Cash-Pay Pharmacies and Total Funding, 2025	
Exhibit 90: Cash-Pay Pharmacies, Estimates of Total Prescription Savings vs. Medicare Part D, 2020 to 2023	
Exhibit 91: Discount Card Claims as Share of Total Equivalent Prescriptions, by Vendor, 2019 to 2024	
Exhibit 92: Share of Discount Card Claims vs. Overall Prescription Share, by Dispensing Format, 2024	
Exhibit 93: Pharmacy Distribution and Reimbursement System for Outpatient Generic Drugs with a Discount C	
Exhibit 94: Prescription Economics with a Discount Card—Traditional Generic Drug Example	
Exhibit 95: GoodRx, Prescription Revenues and Consumer Out-of-Pocket Cost, 2016 to 2024	
Exhibit 96: Employers Adoption of Patient-Paid Prescriptions with Benefit Design, By Employer Size, 2024	
Exhibit 97: Pharmacy Benefit Management Contracting Approach, by Company Size, 2019 vs. 2024	
Exhibit 98: PBM Selection Factors, by Type of Plan Sponsor, 2024	

The 2025 Economic Report on U.S. Pharmacies and Pharmacy Benefit Managers

Exhibit 99: Adoption of PBM National Formulary, by Type of Plan Sponsor, 2024	155
Exhibit 100: Number of Products on PBM Formulary Exclusion Lists, by PBM, 2012 to 2025	156
Exhibit 101: Number of Formulary Exclusions for Oncology Products, 2017 to 2024	157
Exhibit 102: Formulary Coverage for Humira and Its Biosimilars, by PBM, 2025	159
Exhibit 103: Prevalence of Utilization Management Tools, Commercial Plan Sponsors, 2014 vs. 2024	163
Exhibit 104: Use of Prior Authorization and Step Therapy for Single-Source Brand-Name Drugs, by Therapeut	ic
Class, 2020	163
Exhibit 105: Prevalence of Utilization Management Tools, Medicare Part D Plans, 2024	164
Exhibit 106: Prevalence of Utilization Management Tools to Manage Oncology Drug Costs, By Type of Drug,	
Medicare Part D Plans, 2020	
Exhibit 107: PBM Market Share, by Total Equivalent Prescription Claims, 2023 vs. 2024	166
Exhibit 108: Express Scripts, Annual Prescription Claims, by Channel, 2019 to 2024	169
Exhibit 109: Plan Sponsors' Satisfaction with PBM Transparency, by PBM Size, 2024	178
Exhibit 110: PBM-Owned Purchasing Groups and Participation, 2025	180
Exhibit 111: Largest Pharmacy Services Administrative Organizations, by Membership and Ownership, 2024.	188
Exhibit 112: Key Components of PBM Compensation	190
Exhibit 113: Administrative Fees as a Percentage of WAC, by PBM, 2019	191
Exhibit 114: Share of Plans Using Various Compensation Elements in PBM Contracts, By Type of Plan Sponsor	
Exhibit 115: Average PBM Network Spread in Medicaid Managed Care, by State, 2018 to 2019	194
Exhibit 116: Imatinib Mesylate, Fee-for-Service and Managed Medicaid Spreads, 2017 to 2024	195
Exhibit 117: Common Pharmacy Benefit Plan Designs	199
Exhibit 118: Share of Employees Covered by a High-Deductible Health Plan, 2006 to 2024	200
Exhibit 119: Distribution of Cost Sharing Formulas for Prescription Drug Benefits in Employer-Sponsored Plar Plan Type, 2024	•
Exhibit 120: Type of Cost Sharing for Prescription Drug Benefits, Employer-Sponsored Plans Without High Deductibles, by Benefit Tier, 2024	201
Exhibit 121: Type of Cost Sharing for Prescription Drug Benefits, Employer-Sponsored Plans with High Deduc by Benefit Tier, 2024	
Exhibit 122: Average Cost Sharing by Prescription Drug Tier, Employer-Sponsored Plans, 2024	202
Exhibit 123: Number of Specialty Drug Cost-Sharing Tiers, by Type of Plan Sponsor, 2023	203
Exhibit 124: Distribution of Coinsurance Structures for Prescription Drug Benefits, Employer-Sponsored Plans Fourth and Specialty Tiers, 2024	-
Exhibit 125: Percentage of Covered Workers with No Prescription Drug Coverage Before Annual Deductible, Plan Type, 2019 vs. 2024	
Exhibit 126: Percentage of Covered Workers with Pharmacy Benefit Deductibles, Employer-Sponsored Plans, to 2024	
Exhibit 127: Enrollment in Individual Insurance Market, by Source of Plan, 2015 to 2024	207

Exhibit 128: Type of Cost Sharing for Prescription Drug Benefits, Silver Health Insurance Marketplace Plans, 2024
Exhibit 129: Average Cost Sharing by Prescription Drug Tier, Silver Health Insurance Marketplace Plans, 202420
Exhibit 130: Presence of Separate Prescription Drug Deductibles in Silver Plans on Health Insurance Marketplaces,
2014 to 2024
Exhibit 131: Medicare Part D Enrollment, by Type of Plan, 2010 to 202421
Exhibit 132: Standard Medicare Prescription Drug Benefit, 202421
Exhibit 133: Monthly Rebate per Medicare Advantage Beneficiary, by Extra Benefit Type, 2020 to 202521
Exhibit 134: Type of Cost Sharing for Prescription Drug Benefits, Medicare Part D Plans, 202421
Exhibit 135: Median Cost Sharing by Prescription Drug Tier, Medicare Part D PDPs, 202421
Exhibit 136: Median Cost Sharing by Prescription Drug Tier, Medicare Advantage Plans, 202421
Exhibit 137: Distribution of Coinsurance Rates for Specialty Drugs, Medicare Part D Plans, 202321
Exhibit 138: Median Cost Sharing Amounts for 14 Largest Medicare Part D Plans, 202421
Exhibit 139: Summary of Plan Sponsors' Tools for Accessing Manufacturer Patient Support Funds to Offset Drug
Spending
Exhibit 140: Prevalence of Copayment Offset Programs for Specialty Drugs, 2020 vs. 202421
Exhibit 141: Value of Manufacturer Copayment Offset Programs, 2019 to 202421
Exhibit 142: Share of Prescriptions Using Manufacturer Cost Sharing Assistance for Brand-Name Drugs, by
Therapeutic Class, 2023
Exhibit 143: Distribution of Annual Value of Manufacturer Copay Offset Programs, 2024
Exhibit 144: Commercial Plan Sponsor Views on Specialty Copayment Assistance Programs, 2018 vs. 202422
Exhibit 145: Pharmacist Views on Copayment Assistance Programs, 2020
Exhibit 146: Pharmaceutical Manufacturer Charitable Foundations, by Total Giving, 2021 to 202322
Exhibit 147: Prescription Economics for Copay Accumulators, Maximizers, and Alternative Funding Programs— Specialty Brand-Name Drug Example
Exhibit 148: Copay Accumulator Adjustment and Copay Maximizers, Implementation in Commercial Insurance, 2018 to 2024
Exhibit 149: Share of Patients with Copay Accumulator Adjustment and Copay Maximizers Applied to Benefit, by Therapeutic Class, 2019 vs. 2023
Exhibit 150: Use of Alternative Funding Programs (AFPs) in Commercial Insurance, 2021 to 2023
Exhibit 151: Consumers' Out-of-Pocket Spending Share of Outpatient Prescription Drug Expenditures, 1963 to 202
Exhibit 152: Per Capita Out-of-Pocket Spending on Outpatient Prescription Drugs, Nominal vs. Inflation-Adjusted, 2010 to 202323
Exhibit 153: Average Per-Prescription Patient Out-of-Pocket Costs, by Type of Prescription, 2015 vs. 202323
Exhibit 154: Distribution of Annual Patient Out-of-Pocket Spending, by Type of Health Plan, 2023
Exhibit 155: Share of Employees with Cost Sharing Reduced or Waived for Medications to Treat Chronic Conditions
by Company Size, 2024

Threshold, 2007 to 2022	Exhibit 156: Products with Cost Sharing Waived in High-Deductible Employer-Sponsored Health Plans, by Medication Class, 2021	239
Exhibit 159: Average Out-of-Pocket Spending on Prescription Drugs for Medicare Part D Beneficiaries, by LIS Status, 2007 to 2022	Exhibit 157: Type of Cost Sharing for Out-of-Pocket Spending on Brand-Name Prescriptions, 2015 vs. 2024	240
2007 to 2022 241 Exhibit 160: Number of Medicare Part D Beneficiaries with Out-of-Pocket Obligations Above the Catastrophic 242 Exhibit 161: Impact of IRA on Average Annual Out-of-Pocket Part D Spending, by Medical Condition, 2025	Exhibit 158: Share of Prescriptions vs. Final Out-of-Pocket Spending, by Type of Cost Sharing and Therapy, 202	21 240
Threshold, 2007 to 2022		
Exhibit 162: New-to-Product Prescription Abandonment, by Patient Out-of-Pocket Cost, 2023 244 Exhibit 163: Consumer Understanding of Health Insurance Terms, by Racial/Ethnic Group 245 Exhibit 164: CVS Health, Quarterly Retail/LTC Prescription Revenues, 2019 to 2024 246 Exhibit 165: Summary of Pharmacy Benefit Network Design Options 248 Exhibit 166: Driving Distance to Nearest Retail Pharmacy, by Degree of Urbanization, 2020 249 Exhibit 167: Medicare Part D PDPs with Preferred Pharmacy Networks, 2011 to 2025 253 Exhibit 169: Participation as a Preferred Cost Sharing Pharmacy in Selected Medicare Part D PDPs, by Retail Chain, 2025 256 Exhibit 170: Enrollment in Medicare Part D PDPs with Preferred Cost Sharing Networks, by Pharmacy Chain, 2023 257 Exhibit 171: Participation as a Preferred Cost Sharing Pharmacy in Selected Medicare Part D PDPs, by PSAO, 2025 258 Exhibit 171: Participation as a Preferred Cost Sharing Pharmacy in Selected Medicare Part D PDPs, by PSAO, 2025 258 Exhibit 172: Share of Employer-Sponsored Plans with a Preferred Retail Pharmacy Network, 2012 to 2024 260 Exhibit 174: Health Systems' Requirements for Employee Use of an In-House Pharmacy, 2024 261 Exhibit 174: Health Systems' Requirements for Employee Use of an In-House Pharmacy, Employer-Sponsored Plans, 2013 to 2023 263 Exhibit 176: TRICARE, Share of Net Spending on Outpatient Prescri	Exhibit 160: Number of Medicare Part D Beneficiaries with Out-of-Pocket Obligations Above the Catastrophic Threshold, 2007 to 2022	
Exhibit 163: Consumer Understanding of Health Insurance Terms, by Racial/Ethnic Group	Exhibit 161: Impact of IRA on Average Annual Out-of-Pocket Part D Spending, by Medical Condition, 2025	243
Exhibit 164: CVS Health, Quarterly Retail/LTC Prescription Revenues, 2019 to 2024	Exhibit 162: New-to-Product Prescription Abandonment, by Patient Out-of-Pocket Cost, 2023	244
Exhibit 165: Summary of Pharmacy Benefit Network Design Options	Exhibit 163: Consumer Understanding of Health Insurance Terms, by Racial/Ethnic Group	245
Exhibit 166: Driving Distance to Nearest Retail Pharmacy, by Degree of Urbanization, 2020	Exhibit 164: CVS Health, Quarterly Retail/LTC Prescription Revenues, 2019 to 2024	246
Exhibit 167: Medicare Part D PDPs with Preferred Pharmacy Networks, 2011 to 2025	Exhibit 165: Summary of Pharmacy Benefit Network Design Options	248
Exhibit 168: Medicare Advantage Prescription Drug (MA-PD) Plans with Preferred Pharmacy Networks, by Plan Type, 2025	Exhibit 166: Driving Distance to Nearest Retail Pharmacy, by Degree of Urbanization, 2020	249
Type, 2025	Exhibit 167: Medicare Part D PDPs with Preferred Pharmacy Networks, 2011 to 2025	253
2025256Exhibit 170: Enrollment in Medicare Part D PDPs with Preferred Cost Sharing Networks, by Pharmacy Chain, 2023to 2025257Exhibit 171: Participation as a Preferred Cost Sharing Pharmacy in Selected Medicare Part D PDPs, by PSAO, 2025258Exhibit 172: Share of Employer-Sponsored Plans with a Preferred Retail Pharmacy Network, 2012 to 2024260Exhibit 173: Number of Locations in the TRICARE Retail Pharmacy Network, By Dispensing Format, 2021 to 2024261Exhibit 174: Health Systems' Requirements for Employee Use of an In-House Pharmacy, 2024262Exhibit 175: Mandatory Mail Pharmacy Utilization for Maintenance Medications, Employer-Sponsored Plans, 2013to 2024263Exhibit 176: TRICARE, Share of Net Spending on Outpatient Prescriptions, by Dispensing Outlet, 2013 to 2023264Exhibit 177: Rebate Guarantees Affected by Not Using PBM-Affiliated Specialty Pharmacy, Employer-SponsoredPlans, 2018 to 2023265Exhibit 178: Share of Large Employers with Restricted Specialty Pharmacy Network, by Network Size, 2011 to 2024266Exhibit 179: Share of Prescriptions and Dispensing Revenues from Specialty Drugs, PBM-Affiliate Pharmacies, 2017to 2022267Exhibit 180: Health Systems' Requirements for Employee Use of Internal Specialty Pharmacies, by Site of Care268Exhibit 181: Reimbursement for Provider-Administered Specialty Drugs vs. Specialty Pharmacies, by Site of Care		
Exhibit 170: Enrollment in Medicare Part D PDPs with Preferred Cost Sharing Networks, by Pharmacy Chain, 2023 to 2025		
Exhibit 171: Participation as a Preferred Cost Sharing Pharmacy in Selected Medicare Part D PDPs, by PSAO, 2025258Exhibit 172: Share of Employer-Sponsored Plans with a Preferred Retail Pharmacy Network, 2012 to 2024	Exhibit 170: Enrollment in Medicare Part D PDPs with Preferred Cost Sharing Networks, by Pharmacy Chain, 2	023
Exhibit 173: Number of Locations in the TRICARE Retail Pharmacy Network, By Dispensing Format, 2021 to 2024261Exhibit 174: Health Systems' Requirements for Employee Use of an In-House Pharmacy, 2024262Exhibit 175: Mandatory Mail Pharmacy Utilization for Maintenance Medications, Employer-Sponsored Plans, 2013to 2024263Exhibit 176: TRICARE, Share of Net Spending on Outpatient Prescriptions, by Dispensing Outlet, 2013 to 2023264Exhibit 177: Rebate Guarantees Affected by Not Using PBM-Affiliated Specialty Pharmacy, Employer-SponsoredPlans, 2018 to 2023265Exhibit 178: Share of Large Employers with Restricted Specialty Pharmacy Network, by Network Size, 2011 to 2024266Exhibit 179: Share of Prescriptions and Dispensing Revenues from Specialty Drugs, PBM-Affiliate Pharmacies, 2017to 2022267Exhibit 180: Health Systems' Requirements for Employee Use of Internal Specialty Pharmacies, 2022268Exhibit 181: Reimbursement for Provider-Administered Specialty Drugs vs. Specialty Pharmacies, by Site of Care	Exhibit 171: Participation as a Preferred Cost Sharing Pharmacy in Selected Medicare Part D PDPs, by PSAO, 20	025
261 Exhibit 174: Health Systems' Requirements for Employee Use of an In-House Pharmacy, 2024		
Exhibit 175: Mandatory Mail Pharmacy Utilization for Maintenance Medications, Employer-Sponsored Plans, 2013 to 2024		
to 2024	Exhibit 174: Health Systems' Requirements for Employee Use of an In-House Pharmacy, 2024	262
Exhibit 177: Rebate Guarantees Affected by Not Using PBM-Affiliated Specialty Pharmacy, Employer-Sponsored Plans, 2018 to 2023		
Plans, 2018 to 2023 265 Exhibit 178: Share of Large Employers with Restricted Specialty Pharmacy Network, by Network Size, 2011 to 2024 266 Exhibit 179: Share of Prescriptions and Dispensing Revenues from Specialty Drugs, PBM-Affiliate Pharmacies, 2017 to 2022 267 Exhibit 180: Health Systems' Requirements for Employee Use of Internal Specialty Pharmacies, 2022 268 Exhibit 181: Reimbursement for Provider-Administered Specialty Drugs vs. Specialty Pharmacies, by Site of Care	Exhibit 176: TRICARE, Share of Net Spending on Outpatient Prescriptions, by Dispensing Outlet, 2013 to 2023.	264
266 Exhibit 179: Share of Prescriptions and Dispensing Revenues from Specialty Drugs, PBM-Affiliate Pharmacies, 2017 to 2022		
to 2022		
Exhibit 181: Reimbursement for Provider-Administered Specialty Drugs vs. Specialty Pharmacies, by Site of Care		
	Exhibit 180: Health Systems' Requirements for Employee Use of Internal Specialty Pharmacies, 2022	268
		are

Exhibit 182: White Bagging Approach for Distribution and Reimbursement of Provider-Administered Outpatient	:
Drugs	.270
Exhibit 183: UnitedHealthcare, White Bagging Requirements for Hospital Outpatient Providers, by Specialty Pharmacy, 2025	.271
Exhibit 184: Drug Sourcing for Infused Oncology Therapies, by Practice Type and Source, 2019 vs. 2024	.272
Exhibit 185: Payer Reimbursement and Patient Out-of-Pocket Obligation for Oncology Drugs, White Bagging vs. Buy-and-Bill, 2020	
Exhibit 186: Share of Hospitals Permitting Pharmacy Sourcing of Infused Drugs, by Source, 2020 vs. 2022	.275
Exhibit 187: Payer Methodologies for Computing a Pharmacy's Estimated Acquisition Cost	.280
Exhibit 188: Distribution of Retail Pharmacy Dispensing Fees, 2020	.281
Exhibit 189: Pharmacy AWP Reimbursement and Copayments for Brand-Name Prescriptions, by Dispensing Format, 2024	
Exhibit 190: Plan Sponsor Tactics to Increase Use of 90-day Prescriptions, by Dispensing Channel, 2023	.285
Exhibit 191: Imatinib Mesylate, AWP and WAC Prices, By Manufacturer, 2024	.287
Exhibit 192: AWP Reimbursement and Copayments for Generic Prescriptions, by Dispensing Format, 2024	.288
Exhibit 193: Basis of Retail Pharmacy Reimbursement for Generic Drug Prescriptions, by Method, 2020	.289
Exhibit 194: Pharmacy Reimbursement in Medicaid, Fee-for-Service vs. Managed Medicaid	.292
Exhibit 195: Pharmacy Reimbursement Methodology and Dispensing Fee, Largest Fee-for-Service State Medicai Programs, 2024	
Exhibit 196: Share of Employers Receiving Rebates for Traditional and Specialty Drugs, 2014 vs. 2024	.301
Exhibit 197: PBM Rebate Arrangements for Traditional and Specialty Medications in Employer-Sponsored Plans,	,
2014 vs. 2024	.301
Exhibit 198: Use of Manufacturers' Rebate and Other Payments to PBMs, Texas, 2016 to 2023	.304
Exhibit 199: Value of Direct and Indirect Remuneration (DIR) in Medicare Part D, 2012 to 2024	.307
Exhibit 200: Medicare Part D, Value of Direct and Indirect Remuneration (DIR), by Source and Type of Drug, 202	
Exhibit 201: Value of Manufacturers' Coverage Gap Discounts in Medicare Part D, 2014 to 2024	.309
Exhibit 202: Medicaid Program, Gross Prescription Spending and Prescriptions, Fee-for-Service vs. Managed Car 2023	,
Exhibit 203: Medicaid, Gross vs. Net Spending on Outpatient Drugs, 2015 to 2023	.315
Exhibit 204: Brand-Name Drugs, Change in Average List and Net Prices, 2014 to 2024	.317
Exhibit 205: Change in List vs. Net Price, by Manufacturer, 2023	.319
Exhibit 206: Average Difference Between List and Net Prices, by Therapeutic Area, 2012 to 2024	.321
Exhibit 207: Total Value of Pharmaceutical Manufacturers' Gross-to-Net Reductions for All Brand-Name Drugs, 2020 to 2024	.322
Exhibit 208: Components of Pharmaceutical Manufacturers' Gross-to-Net Gap for All Brand-Name Drugs, by	
Source, 2024	.323
Exhibit 209: Components of Gross-to-Net Bubble, Brand-Name Insulin Products, 2012 vs. 2022	.325
Exhibit 210: Components of Gross-to-Net Bubble, Johnson & Johnson Innovative Medicines, 2023	.326

Exhibit 211: Application of Pharmacy Benefit Rebates in Employer-Sponsored Healthcare Plans, 2024	327
Exhibit 212: Prescription Economics for a Third-Party Payer—Traditional Brand-Name Drug Example	334
Exhibit 213: Prescription Economics for a Third-Party Payer—Traditional Brand-Name Drug Example in a High-	
Deductible Health Plan	336
Exhibit 214: Prescription Economics for a Third-Party Payer—Traditional Brand-Name Drug Example in High-	
Deductible Health Plan with Point-of-Sale Rebates	
Exhibit 215: Prescription Economics for a Third-Party Payer—Specialty Brand-Name Drug Example	
Exhibit 216: U.S. Drug Distribution and Related Revenues at Big Three Wholesalers, 2024	
Exhibit 217: Determination of a Pharmacy's Brand-Name Drug Acquisition Cost from a Wholesaler	346
Exhibit 218: Pharmacy Buying Groups and Primary/Preferred Wholesaler Relationships, by Number of Pharma 2024	
Exhibit 219: Share of U.S. Generic Purchasing Volume, by Organization, 2024	350
Exhibit 220: Overall Gross Margins for Chain and Independent Drugstores, 2006 to 2024	353
Exhibit 221: Total Gross Profits for Chain and Independent Drugstores, 2020 to 2024	353
Exhibit 222: Overall Gross Margins for Chain and Independent Drugstores, by Company, 2024	
Exhibit 223: Prescriptions as a Percentage of Revenues, by Company, 2013 to 2024	
Exhibit 224: Components of a Pharmacy's Cost of Nonspecialty Dispensing, by State	356
Exhibit 225: Average Cost of Dispensing in Retail Pharmacies, by Dispensing Format and State	
Exhibit 226: Example of Brand-Name Prescription Economics for a Retail Pharmacy	
Exhibit 227: Independent Pharmacies, Average Per-Prescription Gross Profits and Margins, 2019 to 2023	359
Exhibit 228: BrightSpring Health Services, Average Per-Prescription Gross Profits and Margins, 2020 to 2024	359
Exhibit 229: Top Three PBMs, Sources of Gross Profit, 2024	360
Exhibit 230: Effect of Brand-Name List Price Increases on a Prescription's Gross Profit	363
Exhibit 231: Median AWP Discount for Generic Drugs Sold to Retail Pharmacies, by Number of Manufacturers,	,
2024	365
Exhibit 232: Life Cycle of Per-Prescription Gross Profits, Brand vs. Multisource Generic	368
Exhibit 233: Types of Pharmacy Performance Metrics Used by Payers, by Plan Type	370
Exhibit 234: Net Value of Pharmacy DIR Fees in Medicare Part D, 2012 to 2024	371
Exhibit 235: 340B Drug Pricing Program, Purchases by Covered Entities, 2010 to 2024	375
Exhibit 236: Estimated 340B Discounts on Brand-Name Drugs, by Therapeutic Class, 2018	375
Exhibit 237: 340B Contract Pharmacy Locations, 2010 to 2023\4	376
Exhibit 238: 340B Contract Pharmacy Relationships, by Entity Type and Company, 2024	377
Exhibit 239: Growth in Value of Non-340B vs. 340B Purchases at List Prices, by Channel, 2019 to 2023	379
Exhibit 240: 340B Covered Entities, by Number of Contract Pharmacies, 2024	379
Exhibit 241: Flow of Funds and Product for a 340B Contract Pharmacy Network	380
Exhibit 242: 340B Software Vendors with Drug Channel Ownership, 2024	382
Exhibit 243: How a 340B Covered Entity Generates Funds from the 340B Program	383

Exhibit 244: 340B Prescription Economics for a Covered Entity, a Contract Pharmacy, and a Patient—Specialty Brand-Name Drug Example	
Exhibit 245: Total Gross Profits from 340B Contract Pharmacy, by Company, 2019 to 2023	387
Exhibit 246: Summary of List Price Reductions for Selected Brand-Name Drugs, 2024/2025	391
Exhibit 247: Average Year-over-Year Change in Pricing of Mature Generic Drugs, Oral vs. Injectable, 2015 to 20	
Exhibit 248: Generic Drug Approvals, FDA, 2014 to 2024	
Exhibit 249: Actual and Projected Growth Rates in National Health and Outpatient Prescription Drug Expendit 2019 to 2029.	
Exhibit 250: Source of Payment for Outpatient Prescription Drug Expenditures, 2029	397
Exhibit 251: Number of U.S. Biosimilar Approvals, by Product Type, 2015 to 2024	400
Exhibit 252: Insulin Glargine, Share of New-to-Brand Prescriptions Written vs. Dispensed, 2023	404
Exhibit 253: Physician Perceptions of Biosimilars, by Specialty, 2023	405
Exhibit 254: Top Specialty Therapy Categories, Generic Drugs as a Share of Prescriptions and Net Spending, 20	
Exhibit 255: Nonbiological Specialty Drugs, Pharmacy Acquisition Cost per Unit for Brand-Name vs. Generic Version, 2024	
Exhibit 256: Imatinib Mesylate, Medicare Part D Prescription Reimbursement vs. Pharmacy Acquisition Cost, 2 to 2023	
Exhibit 257: Dispensing Spreads for Specialty Generic Drugs at PBM-Affiliated Pharmacies, 2017 to 2021	409
Exhibit 258: Total Brand Revenues Lost to Generic and Biosimilar Launches, by Product Type, 2019 to 2028	410
Exhibit 259: Pharmacy Industry Prescription Revenues, Traditional vs. Specialty Drugs, 2019 to 2029	411
Exhibit 260: Vertical Business Relationships Within the U.S. Drug Channel, 2025	412
Exhibit 261: Annual Change in Value of 340B Purchases, by Channel, 2019 to 2023	427
Exhibit 262: Share of 340B Purchases, by Channel, 2019 to 2023	428
Exhibit 263: Pharmacy Locations Acquired, by Company, 2010 to 2024	430
Exhibit 264: U.S. Retail Pharmacy Store Count, CVS vs. Walgreens, 2014 to 2024	432
Exhibit 265: Standard Medicare Prescription Drug Benefit, 2024 vs. 2025	435
Exhibit 266: Prices for Products Selected for 2026 Medicare Drug Price Negotiation Program, by Total and Out Pocket Spending	
Exhibit 267: Number of Stand-Alone Medicare Part D Prescription Drug Plans, 2007 to 2025	