

**From:** [Bartuska, Chrystal A.](#)  
**To:** [Matthews, Jolie](#)  
**Subject:** RE: Regulatory Framework Task Force - Request for Comments on Proposed Revised 2024 PBM Subgroup Charges by Friday, April 19  
**Date:** Wednesday, March 27, 2024 2:46:36 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Hello Jolie,

Nort Dakota suggests that in 5C "and consider any necessary updates to" be removed and change "out of" to "due to." The charge would then read "Review the *Health Carrier Prescription Drug Benefit Management Model Act (#22)* due to the emergence of greater regulation in the prescription drug ecosystem." We believe that this change removes the pressure from the working group to feel compelled to offer updates to Model #22 when the focus should be on a thorough review during the remainder of 2024.

**CHRISTAL BARTUSKA** | Division Director, Life & Health/Medicare  
**North Dakota Insurance Department**

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**From:** Matthews, Jolie <JMatthews@naic.org>  
**Sent:** Wednesday, March 20, 2024 8:27 AM  
**To:** Matthews, Jolie <JMatthews@naic.org>  
**Subject:** Regulatory Framework Task Force - Request for Comments on Proposed Revised 2024 PBM Subgroup Charges by Friday, April 19

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To the Regulatory Framework (B) Task Force members and Pharmacy Benefit Manager Regulatory Issues (B) Subgroup members, interested regulators, and interested parties:

At the Regulatory Framework (B) Task Force’s meeting at the Spring National Meeting, the

Task Force set a 30-day public comment period ending **Friday, April 19** to receive comments on the draft proposed revised 2024 charges for the Pharmacy Benefit Manager Regulatory Issues (B) Subgroup, which I have attached.

If you have comments on the draft revised proposed charges, please send those comments to me, Jolie Matthews, by email only to [jmatthews@naic.org](mailto:jmatthews@naic.org), by **Friday, April 19**. When submitting your comments, please be as specific as possible as to any suggested revisions you might have, such as specific redline changes. Following the end of the public comment deadline, it is anticipated that the PBM Subgroup will meet to discuss any comments received and consider adoption of the charges, which will then be forwarded to the Task Force for its consideration.

Also, during the Task Force's meeting, it was announced that Joylynn Fix, West Virginia, has agreed to Chair the Subgroup for 2024. In addition, Ashley Scott, Oklahoma, has agreed to remain as the Subgroup's Vice Chair.

If you have any questions, please feel free to contact me.

Thanks,

Jolie

**Jolie H Matthews**  
Senior Health and Life Policy Counsel  
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