

August 31, 2026

Submitted Electronically via jtouschner@naic.org

RE: Comments on Enhanced Health Care Price Transparency

Dear NAIC Enhanced Health Care Price Transparency Workgroup Members,

On behalf of Navitus Health Solutions LLC (“Navitus”) and Lumicera Health Services, we want to thank you for your groups work on such an important topic as Health Care Affordability.

We appreciate the workgroup's thoughtful research and ongoing efforts to provide regulators and policymakers with valuable insights into the various initiatives' states have undertaken in recent years to improve healthcare affordability and expand access to care.

Healthcare is a uniquely complex ecosystem in which consumers must consider a wide range of factors when making decisions about their care, including cost, quality, access, convenience, and clinical outcomes. As a result, efforts to improve affordability must account for the broader dynamics of the healthcare marketplace and the challenges patients face when navigating it.

The brief highlights many of the affordability challenges confronting our nation's healthcare system. Addressing these challenges will require continued innovation in how healthcare products and services are delivered, financed, and brought to market, including solutions that extend beyond traditional models of care. Competition plays an important role in promoting value and driving better outcomes, while transparency enables consumers to make more informed decisions by providing greater visibility into costs and available options. Today's healthcare consumers are more engaged and have access to more information than ever before, making transparency an increasingly important component of a well-functioning healthcare system.

It is in this spirit that we respectfully submit the following comments for your consideration. We appreciate the opportunity to provide input on this important initiative and look forward to supporting efforts that advance affordability, transparency, and patient access across the healthcare system.

Our Story

By way of background, Navitus is a transparent pass-through pharmacy benefit manager (PBM) formed more than two decades ago as an alternative to the traditional PBM model. We serve clients across a wide range of health plan products including commercial/employer, individual, small group, Medicare, and Medicaid plans. We focus on removing excessive costs from the prescription pharmaceutical supply chain and making medications more affordable to the people we serve and their employers/plan sponsors. Navitus achieves this through a model that has always passed rebates directly to our customers and strives for lower net cost pharmaceuticals.

As a transparent, pass-through PBM, Navitus is committed to advancing policies that promote clarity, transparency, and affordability in prescription drug benefits.

Lumicera Health Services LLC (“Lumicera”) was established in 2014 at the request of our Navitus clients. Lumicera is the nation’s only cost-plus specialty pharmacy, charging plans what we pay for the medication, plus a fixed patient management fee and shipping fee. Although our parent company LighthouseRx also owns Navitus, our clients are never required to use Lumicera, and only about 30% of our business comes from Navitus-affiliated clients.

Healthcare Price Transparency

As the workgroup continues its exploration of healthcare price transparency, it is important to recognize that meaningful progress begins with transparency across the entire healthcare and pharmaceutical supply chain. Increasing transparency cannot be the responsibility of any single stakeholder. Manufacturers, wholesalers, pharmacy benefit managers, providers, insurers, regulators, and other participants must all be held to the same standard. To achieve measurable improvements in healthcare affordability, transparency must be clearly defined, consistently applied, and standardized across the ecosystem.

The ultimate objective of healthcare price transparency should be to empower patients and help reduce healthcare costs in the United States. As a global leader in healthcare innovation and quality, the United States should also lead in developing transparent, efficient healthcare markets that improve affordability while maintaining access to high-quality care. Patients should have access to meaningful pricing information, including direct-to-consumer and cash pricing options, so they can make informed decisions about their healthcare. Greater transparency creates more efficient markets, and success will require a unified definition and approach to transparency across the healthcare system.

As noted in your overview of the Healthcare Price Transparency Landscape, transparency initiatives are only beginning to influence market behavior. Meaningful change will take time. However, as consumers become more aware of the healthcare pricing information available to them and gain confidence in using that information, their purchasing and healthcare decision-making behavior will evolve accordingly.

To drive lasting change, consumer adoption must be a central focus. This requires increased awareness, education, and a clear articulation of the benefits that transparency provides. A coordinated effort across the healthcare supply chain is necessary to create a movement toward lower healthcare costs and improved patient outcomes. The data and tools needed to support this transformation already exist; the challenge is ensuring they are presented in a way that is actionable, understandable, and trusted by consumers.

Considerations

Several opportunities exist for regulators, insurers, providers, and other healthcare stakeholders to improve transparency and help consumers make informed healthcare decisions.

First, standardization is critical. Transparency efforts will only be effective if pricing information is reported consistently across all stakeholders, enabling consumers to compare options and understand the true cost of care.

Second, information must be consumer friendly. Even when pricing data is available, it must be presented in a clear, accessible, and easily navigable format. Consumers cannot benefit from transparency if the information is overly complex or difficult to interpret.

At Navitus, we remain committed to improving the patient experience and simplifying the healthcare journey. Our recent launch of Clarventa, a transparent drug procurement group, reflects our belief that transparency throughout the supply chain can help identify inefficiencies, promote competition, and ultimately reduce costs for patients and plan sponsors. Initiatives such as these demonstrate how transparency can serve as a practical tool for advancing affordability and access across the healthcare system.

Lastly, we encourage regulators to promote meaningful transparency throughout the entire pharmaceutical supply chain. Increased transparency can help ensure that cost-saving opportunities are identified and passed through to patients and plan sponsors. Navitus is committed to advancing greater transparency and supporting models that empower pharmacies to acquire prescription drugs at

lower costs, ultimately helping to improve affordability and access for patients. We respectfully refer to the attached position paper and accompanying chart for additional discussion and supporting data¹.

Conclusion

As noted above, meaningful healthcare price transparency must begin with transparency across the entire drug supply chain. Lasting and effective changes will require a standardized, consistent approach that promotes accountability among all stakeholders and provides consumers with clear, actionable information to make informed healthcare decisions.

We appreciate the opportunity to provide these comments and commend the workgroup for its efforts to advance healthcare price transparency. Thank you for your consideration of the recommendations outlined above. We welcome the opportunity to provide additional input and participate in future discussions as these important initiatives continue to evolve.

Respectfully,

Stacy Hall, MBA
Director, Government Relations
361 Integrity Dr.
Madison, WI 53717
Office (608) 820-4408
Stacy.hall@lumicera.com
www.Lumicera.com

¹ <file:///C:/Users/msn0126b/OneDrive%20-%20Navitus%20Health%20Solutions%20LLC/Desktop/Broad%20Drug%20Supply%20Chain%20Transparency%20Statement.pdf>