

## Rx Watchdog Report: Brand Name Drug Prices Continue to Climb Despite Low General Inflation Rate

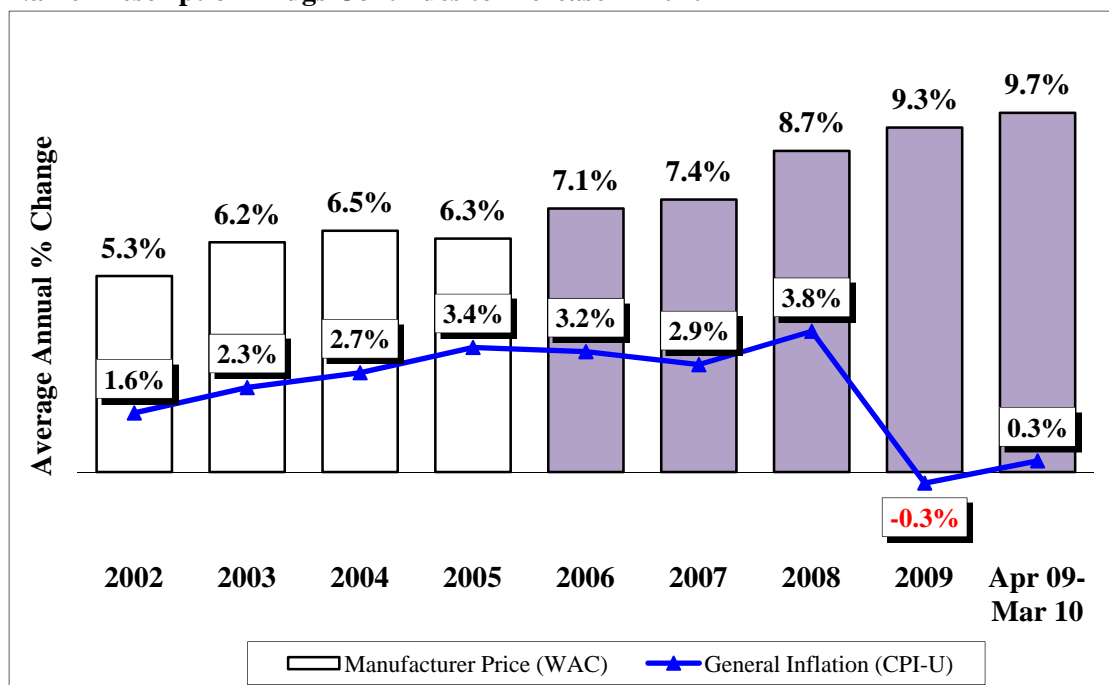
AARP's Public Policy Institute finds that average manufacturer price increases for brand name and specialty prescription drugs widely used by Medicare beneficiaries continued to far outstrip the price increases for other consumer goods and services in the 12 months ending with March 2010. In contrast, average manufacturer prices for widely used generic drugs fell during the same time period. These trends resulted in an average annual rate of increase of 5.3 percent for manufacturer drug prices during the 12 months ending with the first quarter of 2010 despite an extremely low rate of general inflation for all consumer goods and services.

This report presents findings from the first quarter of 2010 on the pattern of manufacturer price<sup>1</sup> changes for brand name, specialty, and generic drugs widely used by Medicare Part D beneficiaries.<sup>2</sup>

### Findings<sup>3</sup>

#### Brand name drugs

Figure 1: Average Annual Percent Change in Manufacturer Prices for Widely Used Brand Name Prescription Drugs Continues to Increase in 2010

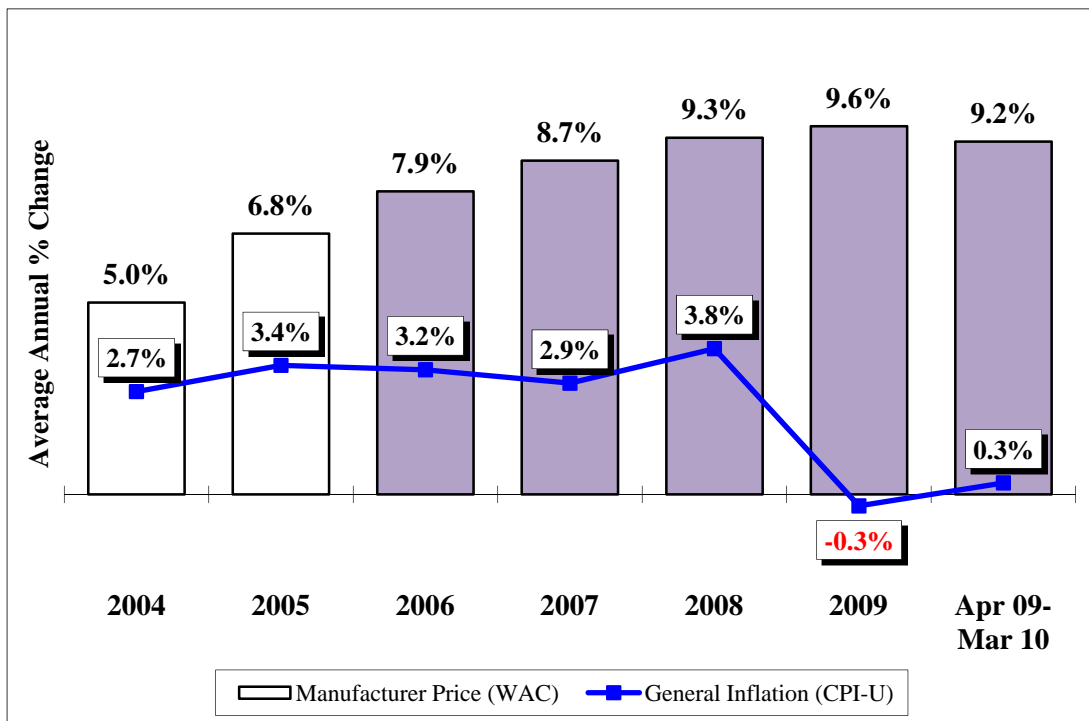


Note: Analyses for 2008, 2009 and 2010 exclude Zyrtec 10 mg tablets, which began to be sold over-the-counter (that is, without a prescription) in January 2008. Shaded bars indicate years when Medicare Part D was operational.

- The price of brand name prescriptions most widely used by Medicare beneficiaries increased by 9.7 percent in the 12 months ending with March 2010 and was much higher than the rate of increase observed during any of the prior eight years (i.e., 2002 to 2009), which ranged from 5.3 percent to 9.3 percent. In contrast, the rate of general inflation was 0.3 percent over the same period.<sup>4</sup>
- 82 of the 219 drug products in the brand name market basket are off-patent. If these drug products are excluded from the analysis, the average annual manufacturer price increase for the remaining drug products (i.e., brand name drug products that do not have generic competition) is 10.0 percent in the 12 months ending with March 2010. This indicates that the off-patent products in our market basket actually lower the average annual change, making our results an underestimate of manufacturer price changes for brand name drug products.
- The average annual cost for a single brand name medication was about \$2,190 in the 12 months ending with the first quarter of 2010. The average annual cost to an individual taking three brand name medications during this 12-month period was \$6,580.
- 88 percent (192 of 219) of the brand name drug products experienced a price increase in the 12-month period (i.e., April 2009 through March 2010). Twenty-seven (12 percent) of the 219 brand name drug products had no change in price during the same period; only 2 of the 27 brand name drug products with no change in price are still under patent.

### Specialty drugs

**Figure 2: Average Annual Percent Change in Manufacturer Prices for Widely Used Specialty Prescription Drugs Remains High in 2010**

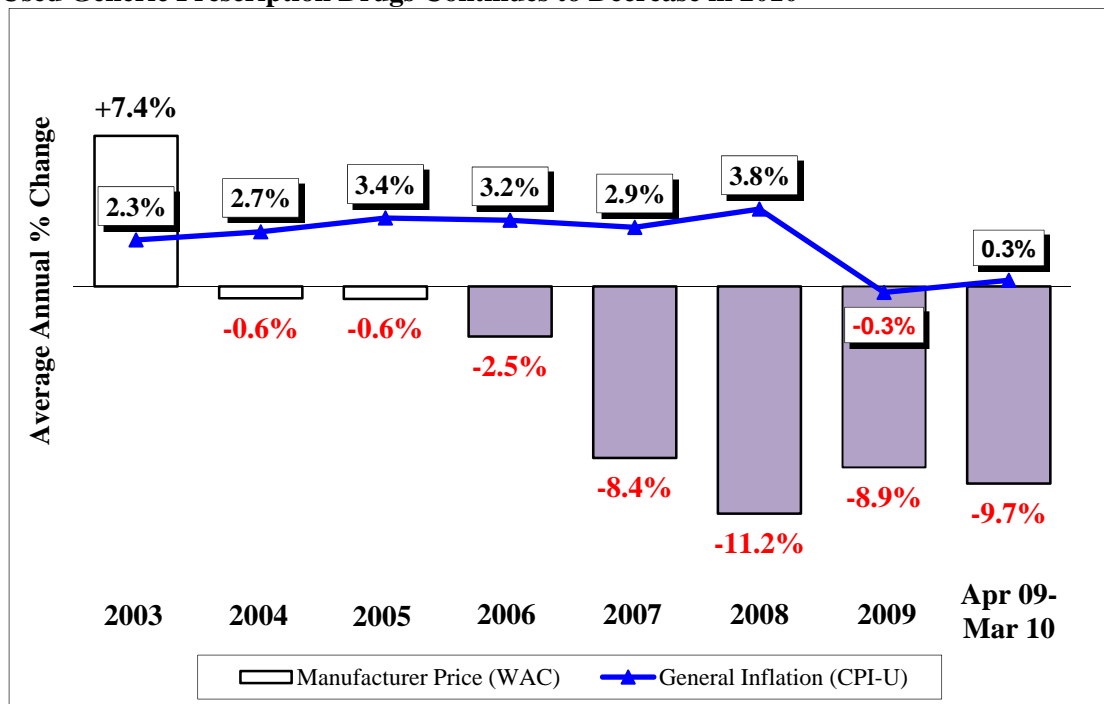


Note: Shaded bars indicate years when Medicare Part D was operational

- The price of 144 specialty prescriptions most widely used by Medicare beneficiaries increased by 9.2 percent in the 12 months ending with March 2010. If the 52 drug products in the specialty market basket that are off-patent are excluded from the analysis, the average manufacturer price change is 9.8 percent over the same time period.
- The average annual cost for just one specialty medication was more than \$34,550 over the 12 months ending with the first quarter of 2010.
- For an individual who takes only one specialty medication on a chronic basis, the average increase in the cost of therapy rose by \$2,760 in the 12 months ending with the first quarter of 2010, compared with an increase of \$3,194 in 2009.
- About two-thirds (90 of the 144) specialty drug products experienced a price increase in the 12-month period (i.e., April 2009 through March 2010). Two of the 144 specialty drug products had a decrease in price and both were generics. One-third (52 of 144) of the specialty drug products had no change in price in the same period; most of the drug products with no price change were generics or off-patent brands.

### Generic drugs

**Figure 3: The Average Annual Percent Change in Manufacturer Prices for Most Widely Used Generic Prescription Drugs Continues to Decrease in 2010**



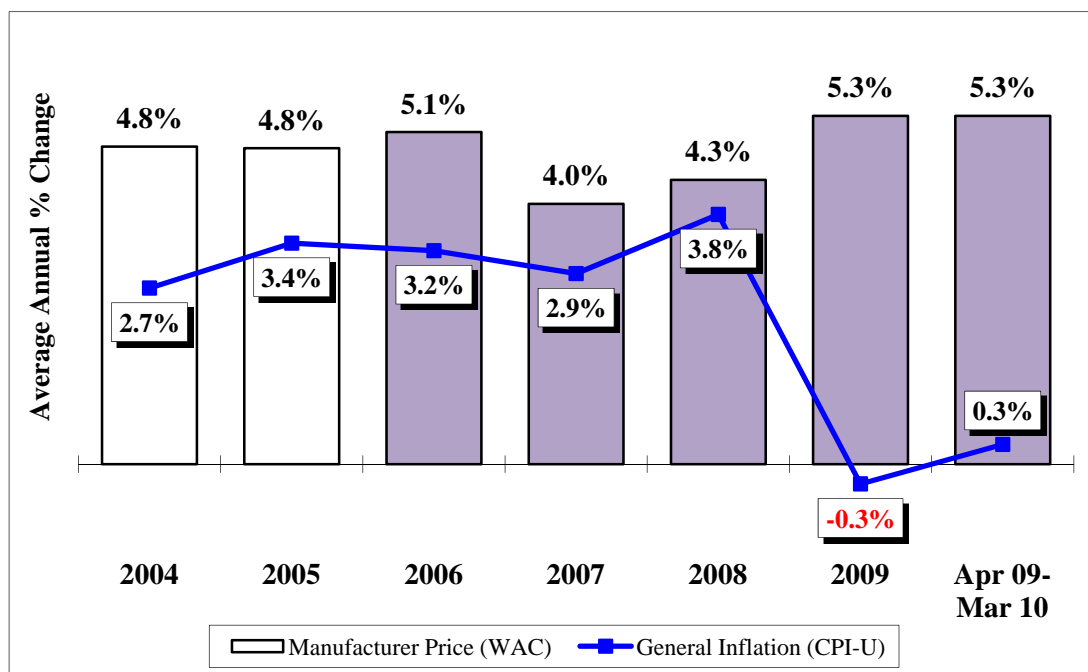
Note: Shaded bars indicate years when Medicare Part D was operational.

- The price of generic prescriptions most widely used by Medicare beneficiaries decreased by an average of 9.7 percent in the 12 months ending with March 2010.
- Prices for most of the generic drug products in the market basket did not change. However, when list price changes do occur, they are usually substantial.

- The average annual cost for one generic medication was \$310 in the 12 months ending with the first quarter of 2010. The average annual cost to an individual taking three generic medications during this 12 month period was \$931.
- For an individual who takes three generic prescriptions on a chronic basis, the average cost of therapy decreased by \$51 in the 12 months ending with the first quarter of 2010, compared with a decrease of \$52 in 2009.
- The average manufacturer price change for the 185 generic drug products most widely used by Medicare beneficiaries in the 12 months ending with the first quarter of 2010 (-9.7 percent) represented a greater decrease than in 2009, when manufacturer prices for widely used generic drugs fell by 8.9 percent.
- Most (86 percent, or 160 of 185) of the generic drug products had no change in price during the 12-month period (i.e., April 2009 through March 2010). About 11 percent (21 of the 185) of the generic drug products had a decrease in price during the same period while four of the generic drug products had an increase in price.

### Combined market basket

**Figure 4: The Average Annual Percent Change in Manufacturer Prices for Most Widely Used Prescription Drugs Continues to Outpace Inflation in 2010**



Note: Shaded bars indicate years when Medicare Part D was operational.

- When combined, the average annual rate of increase for all of the drugs analyzed (brand name, specialty, and generic) was 5.3 percent in the 12 months ending with the first quarter of 2010 (i.e., April 2009 through March 2010).
- This combined rate of growth for drug prices is attributable to continuing high levels of price growth among brand name (9.7 percent) and specialty drugs (9.2 percent) that more than offset the substantial price decreases among generic drugs (-9.7 percent).

## Concluding Observations

This report shows that manufacturer price increases for common brand name and specialty prescription drugs continued to increase substantially despite an extremely low rate of general inflation for all consumer goods and services. In contrast, prices for common generic drugs have declined.

Drug price increases can raise Medicare beneficiaries' costs. Manufacturer price increases to the pharmacy (or other providers) translate into higher out-of-pocket costs for those beneficiaries who pay a percentage of drug costs (coinsurance) rather than a fixed dollar amount (copayment). Higher prices also push more Part D enrollees into the "doughnut hole"—the gap in coverage when enrollees have to pay all of their drug costs—each year.<sup>5</sup> And, once in the doughnut hole, enrollees feel the full effect of the higher manufacturer prices.

The recently-passed health care reform legislation has provisions that will eliminate the Medicare Part D coverage gap through discounts on brand name, biologic, and generic prescription drugs.<sup>6</sup> However, Part D enrollees will continue to be exposed to the effects of the doughnut hole until the legislation's provisions are fully implemented in 2020. Furthermore, the value of closing the doughnut hole, while substantial, could be eroded over the years if escalating drug prices are not addressed.

Higher prices to retail pharmacies are generally passed on as higher costs to consumers and drug plans.<sup>7</sup> Higher drug costs to plans may also result in reduced benefits and higher premiums for enrollees. In fact, Part D premiums for drug plan coverage during 2010 were 11% higher than premiums in 2009.<sup>8</sup>

The recent absence of an increase in general inflation has resulted in no Cost of Living Adjustment for Social Security and Supplemental Security Income recipients in 2010.<sup>9</sup> Yet, individuals who need medications are facing an overall (brand, specialty, and generic) increase in drug prices of 5.3 percent. The impact of drug prices will be substantial for those persons taking brand name medications which have grown in price by an average of 9.7 percent in the 12 months ending with the first quarter of 2010. Equally challenging will be affording the price of specialty drugs which have grown in price by an average of 9.2 percent over the same period. Although generic drug prices have decreased (-9.7 percent), the effect is not sufficient to offset the price increases of brand name and specialty medications.

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<sup>1</sup> The manufacturer price tracked and analyzed for this report was the wholesale acquisition cost (WAC), which is a list price reported by the manufacturer and used by manufacturers on their invoices to wholesalers or other direct purchasers. The actual net transaction price from the manufacturer to the wholesaler or other direct purchaser may be less than the WAC as a result of discounts and rebates. There are no consistent, comprehensive, and publicly reported data sources for this discount and rebate information.

<sup>2</sup> Calculated as a 12-month rolling average and weighted by actual 2006 sales to Medicare Part D enrollees. Previous reports from this series can be found on the AARP Web site at [http://www.aarp.org/research/ppi/health-care/medicare/articles/rx\\_watchdog.html](http://www.aarp.org/research/ppi/health-care/medicare/articles/rx_watchdog.html). Differences between the data reported here and in the previous Rx Watchdog reports are due to drug products with NDCs that have gone inactive. See detailed methodology in Appendix A of the AARP Public Policy Institute's March 2008 report, "Rx Watchdog Report: Trends in Manufacturer Prices of Brand Name Prescription Drugs Used by Medicare Beneficiaries, 2002 to 2007" for details.

<sup>3</sup> All data prepared by the AARP Public Policy Institute and the *PRIME* Institute, University of Minnesota, based on data from Medi-Span Price-Chek PC and Price Rx (Indianapolis, IN: Wolters Kluwer Health Inc.), March 2010.

<sup>4</sup> The general inflation rate, for purposes of this report, is measured by the Consumer Price Index-All Urban Consumers for All Items (seasonally adjusted) and published by Bureau of Labor Statistics series CUSR0000SA0 (CPI-U).

<sup>5</sup> G. Anderson, Statement to the United States Senate Special Committee on Aging, *Seniors Feeling the Squeeze: Rising Drug Prices and the Part D Program*, Hearing, March 17, 2010. Available at [http://aging.senate.gov/hearing\\_detail.cfm?id=323166&](http://aging.senate.gov/hearing_detail.cfm?id=323166&).

<sup>6</sup> Part D enrollees are currently responsible for 100 percent of their prescription drug costs while they are in the doughnut hole. Beginning January 1, 2011, the doughnut hole will begin to close through a combination of Part D enrollee contributions, Medicare contributions, and drug manufacturer contributions. By 2020, enrollees will be responsible for 25 percent of their prescription drug costs in the doughnut hole, giving them the same level of coverage from the time they enter the initial coverage period (i.e., after meeting their deductible) to the time they hit the catastrophic cap.

<sup>7</sup> United States House of Representatives, Committee on Oversight and Government Reform, Majority Staff, *Private Medicare Drug Plans: High Expenses and Low Rebates Increase the Costs of Medicare Drug Coverage*, October 2007, ii, 15. This congressional report found that “When the Part D insurers obtain rebates, however, they do not pass them through to beneficiaries by reducing drug prices in coverage gaps like the ‘doughnut hole.’” This congressional report also found that “In almost all cases, the private (Part D plan) insurers use pricing formulas that pay pharmacies the drug manufacturers’ full list prices minus a fixed percentage and a small dispensing fee. These formulas have resulted in drug prices that are generally no lower than those already available through discount pharmacies and on-line drugstores, while leaving beneficiaries and taxpayers vulnerable to repeated increases in list prices by the drug manufacturers...With only two exceptions, the Part D insurers established drug pricing formulas that pay pharmacies the manufacturers’ published ‘Average Wholesale Prices,’ which are the manufacturers’ list prices, minus a fixed percentage (on average 15%), plus a small dispensing fee (on average \$2.10 per prescription).” The report goes on to say, “One consequence of these pricing formulas is that increases in manufacturer list prices are passed through to beneficiaries.”

<sup>8</sup> A recent report on premiums under Medicare Part D found that monthly premiums for 2010 were projected to be 11% above the monthly Part D premiums in 2009. Hoadley, J, et.al, *Medicare Part D 2010 Data Spotlight: Premiums*, The Henry J. Kaiser Family Foundation, December 2009.

<sup>9</sup> Cost-Of-Living Adjustments, Social Security Administration, SSA Publication No. 05-10526, October 2009. Available at [www.socialsecurity.gov](http://www.socialsecurity.gov).

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Written by Leigh Purvis, AARP Public Policy Institute, and Stephen W. Schondelmeyer, *PRIME* Institute, University of Minnesota.

601 E Street, NW, Washington, DC 20049

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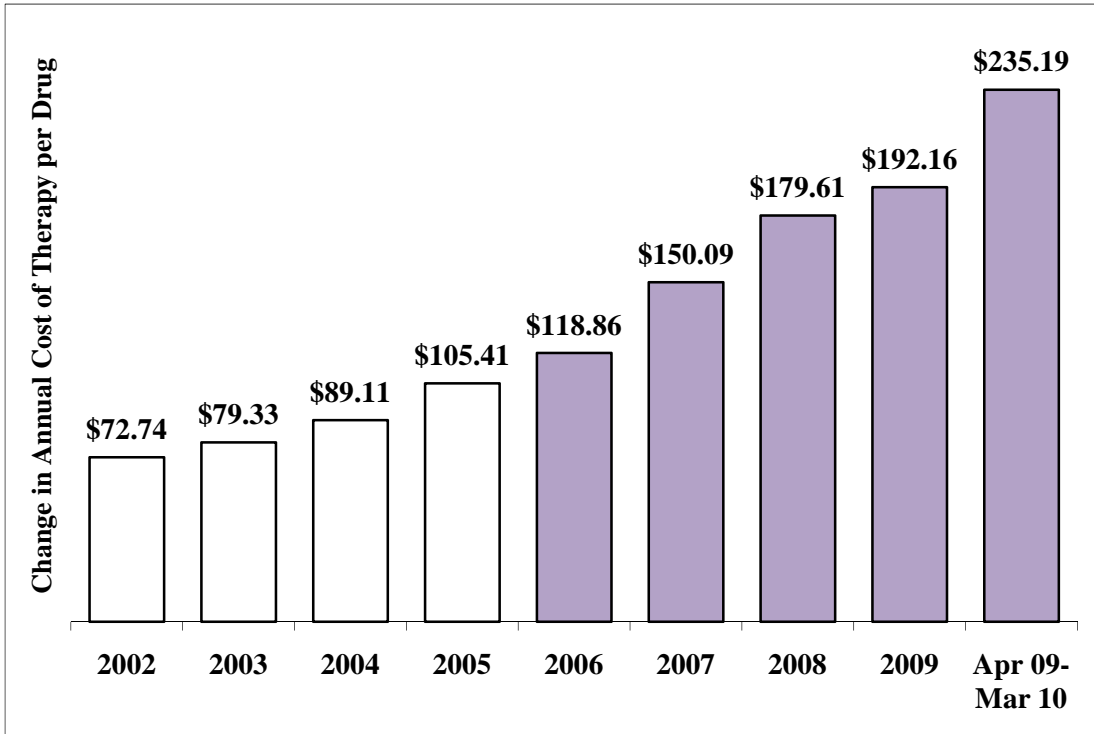
202-434-3890, [ppi@aarpp.org](mailto:ppi@aarpp.org)

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## APPENDIX A: WIDELY USED BRAND NAME PRESCRIPTION DRUGS

**Figure A1: Average Change in Annual Cost of Therapy for Most Widely Used Brand Name Prescription Drugs is Over \$230 in the 12 Months Ending in March 2010**



Note: Analyses for 2008, 2009, and 2010 exclude Zyrtec 10 mg tablets, which began to be sold over-the-counter (that is, without a prescription) in January 2008. Shaded bars indicate years when Medicare Part D was operational. Does not include eight drug products typically used for acute conditions or for less than one year.

**Table A1: All of the Top 25 Brand Name Prescription Drug Products Experienced a Manufacturer Price Change in The Past Year**

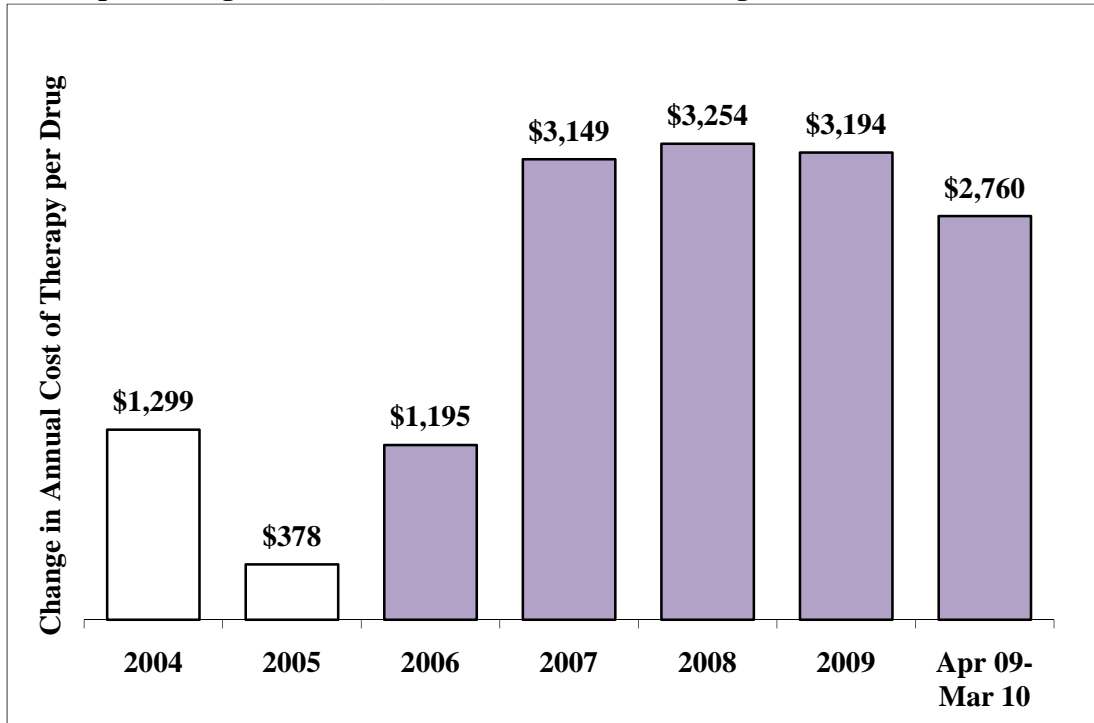
| Rank by Sales among Study Market basket*                          | Product Name, Strength, and Dosage Form | Package Size | Manufacturer           | Therapeutic Class            | % Change in WAC, April 30, 2009-March 31, 2010 |
|---|---|--------------|------------------------|------------------------------|--|
| 1   | Nexium 40 mg capsule                    | 30           | AstraZeneca            | Ulcer Drugs (PPIs)           | 7.4%   |
| 2   | Plavix 75 mg tablet                     | 90           | Bristol-Myers Squibb   | Anticoagulants               | 10.5%  |
| 3   | Prevacid 30 mg DR capsule               | 100          | Takeda Pharmaceuticals | Ulcer Drugs (PPIs)           | 8.1%   |
| 4   | Protonix 40 mg tablet                   | 90           | Wyeth                  | Ulcer Drugs (PPIs)           | 9.3%   |
| 5   | Lipitor 20 mg tablet                    | 90           | Pfizer                 | Cholesterol Agents (HMG CoA) | 5.5%   |
| 6   | Lipitor 10 mg tablet                    | 90           | Pfizer                 | Cholesterol Agents (HMG CoA) | 5.5%   |
| 7   | Aricept 10 mg tablet                    | 30           | Eisai                  | Antidementia Agents          | 13.9%  |
| 8   | Fosamax 70 mg tablet                    | 4            | Merck                  | Osteoporosis Agents          | 6.7%   |
| 9   | Norvasc 10 mg tablet                    | 90           | Pfizer                 | Antihypertensives (CCBs)     | 5.0%   |
| 10  | Advair Diskus 250-50 mist               | 60           | GlaxoSmithKline        | Respiratory Agents           | 7.0%   |
| 11  | Lipitor 40 mg tablet                    | 90           | Pfizer                 | Cholesterol Agents (HMG CoA) | 5.5%   |
| 12  | Actonel 35 mg tablet                    | 4            | Warner Chilcott Pharm  | Osteoporosis Agents          | 9.3%   |
| 13  | Norvasc 5 mg tablet                     | 90           | Pfizer                 | Antihypertensives (CCBs)     | 5.0%   |
| 14  | Celebrex 200 mg capsule                 | 100          | Pfizer                 | Anti-Inflammatory Agents     | 5.0%   |
| 15  | Namenda 10 mg tablet                    | 60           | Forest                 | Antidementia Agents          | 7.6%   |
| 16  | Singulair 10 mg tablet                  | 30           | Merck                  | Respiratory Agents           | 9.7%   |
| 17  | Flomax 0.4 mg capsule                   | 100          | Boehringer Ingelheim   | Prostatic Hypertrophy Agents | 27.6%  |
| 18  | Zetia 10 mg tablet                      | 30           | Merck/Schering-Plough  | Cholesterol Agents (HMG CoA) | 10.8%  |
| 19  | Lexapro 10 mg tablet                    | 100          | Forest                 | Antidepressants (SSRIs)      | 6.4%   |
| 20  | Lantus 100/ml inj                       | 10           | Sanofi-Aventis         | Antidiabetics (Insulins)     | 7.5%   |
| 21  | Zocor 20 mg tablet                      | 30           | Merck                  | Cholesterol Agents (HMG CoA) | 6.3%   |
| 22  | Ambien 10 mg tablet                     | 100          | Sanofi-Aventis         | Sedatives                    | 13.9%  |
| 23  | Seroquel 200 mg tablet                  | 100          | AstraZeneca            | Antipsychotics               | 15.6%  |
| 24  | Zocor 40 mg tablet                      | 30           | Merck                  | Cholesterol Agents (HMG CoA) | 6.3%   |
| 25  | Avandia 4 mg tablet                     | 30           | GlaxoSmithKline        | Antidiabetics (Oral)         | 11.6%  |
| <b>General rate of inflation (as measured by growth in CPI-U)</b> |   |              |                        |                              | <b>0.3%</b>                                    |

\*Ranking based on prescriptions processed by the Medicare Part D plan provider during 2006.



## APPENDIX B: WIDELY USED SPECIALTY PRESCRIPTION DRUGS

**Figure B1: Average Change in Annual Cost of Therapy for Most Widely Used Specialty Prescription Drugs is Over \$2,700 in the 12 Months Ending in March 2010**



Note: Shaded bars indicate years when Medicare Part D was operational. Does not include 49 drug products typically used for acute conditions or for less than one year.

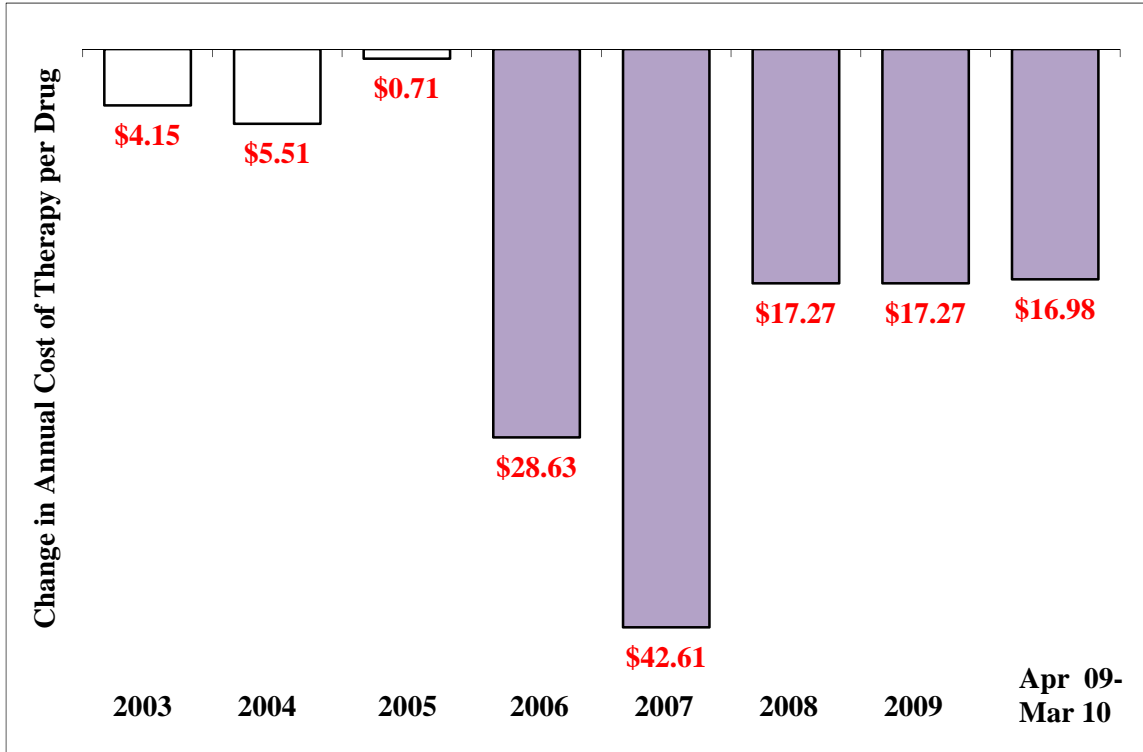
**Table B1: Five of the Top 25 Specialty Prescription Drug Products Had a Manufacturer Price Change of More Than 15 Percent in the Past Year**

| Rank by Sales among Study Market Basket*                          | Product Name, Strength, and Dosage Form | Package Quantity and Size | Manufacturer             | Therapeutic Class         | % Change in WAC, April 30, 2009-March 31, 2010 |
|---|---|---------------------------|--------------------------|---------------------------|--|
| 1   | Renagel 800 mg tablet                   | 1 x 180                   | Genzyme                  | Phosphate Regulation      | 8.8%   |
| 2   | Lovenox 100 mg/ml inj                   | 10 x 0.4                  | Sanofi-Aventis           | Anticoagulants            | 5.0%   |
| 3   | Enbrel 50 mg/ml inj                     | 4 x 1                     | Amgen                    | Arthritis, Severe         | 9.4%   |
| 4   | Humira 50 mg/ml kit                     | 2 x 1                     | Abbott                   | Arthritis, Severe         | 6.2%   |
| 5   | Procrit 40,000 U/ml inj                 | 4 x 1                     | Centocor Ortho Biotech   | Erythropoietins           | 7.4%   |
| 6   | Forteo 250 mcg/ml soln                  | 1 x 28                    | Lilly                    | Calcium Regulators        | 9.1%   |
| 7   | Copaxone 20 mg/ml kit                   | 1 x 30                    | Teva Neuroscience        | Multiple Sclerosis Agents | 24.8%  |
| 8   | Avonex 60 mcg/ml kit                    | 4 x 1                     | Biogen Idec              | Multiple Sclerosis Agents | 19.9%  |
| 9   | Tracleer 125 mg tablet                  | 1 x 60                    | Actelion Pharmaceuticals | Pulmonary Hypertension    | 14.7%  |
| 10  | Reyataz 150 mg capsule                  | 1 x 60                    | Bristol-Myers Squibb     | Antiretrovirals           | 4.5%   |
| 11  | Procrit 20,000 U/ml inj                 | 6 x 2                     | Centocor Ortho Biotech   | Erythropoietins           | 7.4%   |
| 12  | Tarceva 150 mg tablet                   | 1 x 30                    | Genentech                | Cancer Agents             | 8.8%   |
| 13  | Gleevec 400 mg tablet                   | 1 x 30                    | Novartis                 | Cancer Agents             | 15.6%  |
| 14  | Procrit 10,000 U/ml inj                 | 6 x 1                     | Centocor Ortho Biotech   | Erythropoietins           | 7.4%   |
| 15  | Betaseron 0.3 mg inj                    | 15 x 1                    | Bayer Healthcare Pharm   | Multiple Sclerosis Agents | 25.7%  |
| 16  | Risperdal 50 mg inj                     | 1 x 1                     | Janssen                  | Tranquilizers             | 1.3%   |
| 17  | Sensipar 30 mg tablet                   | 1 x 30                    | Amgen                    | Calcium Reduction         | 8.8%   |
| 18  | Zyvox 600 mg tablet                     | 1 x 20                    | Pfizer U.S.              | Antibiotics, Misc.        | 5.5%   |
| 19  | Enbrel 25 mg inj                        | 4 x 1                     | Amgen                    | Arthritis, Severe         | 9.4%   |
| 20  | Trizivir 300 mg-150 mg-300 mg tablet    | 1 x 60                    | Viiiv Healthcare         | Antiretrovirals           | 7.4%   |
| 21  | Sensipar 60 mg tablet                   | 1 x 30                    | Amgen                    | Calcium Reduction         | 8.8%   |
| 22  | Byetta 250 mcg/ml inj                   | 1 x 60                    | Amylin Pharmaceuticals   | Diabetes Care             | 10.8%  |
| 23  | Thalomid 50 mg capsule                  | 10 x 28                   | Celgene Corp             | Leprosy Agents            | 10.6%  |
| 24  | ipratropium 0.02% soln                  | 25 x 2.5                  | Dey Labs                 | Bronchial Dilators        | 0.0%   |
| 25  | Rebif 88 ml inj                         | 12 x 1                    | Serono                   | Multiple Sclerosis Agents | 15.2%  |
| <b>General rate of inflation (as measured by growth in CPI-U)</b> |   |                           |                          |                           | <b>0.3%</b>                                    |

\*Ranking based on prescriptions processed by the Medicare Part D plan provider during 2006.

## APPENDIX C: WIDELY USED GENERIC PRESCRIPTION DRUGS

**Figure C1: The Average Change in Annual Cost of Therapy for Most Widely Used Generic Prescription Drugs Decreased by Almost \$17 in the 12 Months Ending in March 2010**



Note: Shaded bars indicate years when Medicare Part D was operational. Does not include 31 drug products typically used for acute conditions or for less than one year.

**Table C1: Only Four of the Top 25 Generic Prescription Drug Products Had A Manufacturer Price Change in the Past Year**

| Rank by Sales among Study Market basket*                   | Product Name, Strength, and Dosage Form | Package Size | Manufacturer       | Therapeutic Class               | % Change in WAC, April 30, 2009- March 31, 2010 |
|--|---|--------------|--------------------|---------------------------------|---|
| 1  | simvastatin 20 mg tablet                | 30           | Teva               | Cholesterol Agents (HMG Co-A)   | -51.8%  |
| 2  | simvastatin 40 mg tablet                | 90           | Teva               | Cholesterol Agents (HMG Co-A)   | -53.2%  |
| 3  | omeprazole 20 mg capsule                | 1000         | Sandoz             | Ulcer Drugs                     | -27.4%  |
| 4  | metformin 500 mg tablet                 | 100          | Teva               | Antidiabetics, Oral             | -42.6%  |
| 5  | fentanyl 100 mcg/hr patch               | 5            | Sandoz             | Analgesics, Opioid              | 0.0%  |
| 6  | gabapentin 300 mg capsule               | 100          | Greenstone         | Anticonvulsants                 | 0.0%  |
| 7  | lisinopril 20 mg tablet                 | 100          | Sandoz             | Antihypertensives (ACEs)        | 0.0%  |
| 8  | fexofenadine 180 mg tablet              | 100          | Teva               | Antihistamines, Non-Sedating    | 0.0%  |
| 9  | Klor-Con M 20 meq tablet ER             | 100          | Upsher-Smith       | Minerals & Electrolytes         | 0.0%  |
| 10   | pravastatin 40 mg tablet                | 90           | Teva               | Cholesterol Agents (HMG Co-A)   | -63.1%  |
| 11   | azithromycin 250 mg tablet              | 6            | Greenstone         | Antibiotics                     | 0.0%  |
| 12   | fentanyl 50 mcg/hr patch                | 5            | Sandoz             | Analgesics, Opioid              | 0.0%  |
| 13   | lisinopril 40 mg tablet                 | 100          | Sandoz             | Antihypertensives (ACEs)        | 0.0%  |
| 14   | lisinopril 10 mg tablet                 | 100          | Sandoz             | Antihypertensives (ACEs)        | 0.0%  |
| 15   | megestrol acetate 40 mg/ml susp         | 240          | Par                | Antineoplastics                 | 0.0%  |
| 16   | sertraline 100 mg tablet                | 30           | Teva               | Antidepressants (SSRIs)         | 0.0%  |
| 17   | sertraline 50 mg tablet                 | 30           | Teva               | Antidepressants (SSRIs)         | 0.0%  |
| 18   | gabapentin 600 mg tablet                | 100          | Greenstone         | Anticonvulsants                 | 0.0%  |
| 19   | fentanyl 75 mcg/hr patch                | 5            | Sandoz             | Analgesics, Opioid              | 0.0%  |
| 20   | metformin 1000 mg tablet                | 100          | Sandoz             | Antidiabetics, Oral             | 0.0%  |
| 21   | amiodarone 200 mg tablet                | 60           | Sandoz             | Other, Antiarrhythmics          | -11.3%  |
| 22   | propoxyphene-N/APAP 100-650 tablet      | 500          | Teva               | Analgesics, Opioid Combinations | 0.0%  |
| 23   | lovastatin 20 mg tablet                 | 60           | Actavis Elizabeth  | Cholesterol Agents (HMG Co-A)   | -4.7%   |
| 24   | hydrocodone/APAP 5-500 mg tablet        | 500          | Mallinckrodt Pharm | Analgesics, Opioid Combinations | 0.0%  |
| 25   | tramadol HCl 50 mg tablet               | 1000         | Teva               | Analgesics, Opioid              | 0.0%  |
| General rate of inflation (as measured by growth in CPI-U) |   |              |                    |                                 | <b>0.3%</b>                                     |

\*Ranking based on prescriptions processed by the top Medicare Part D plan provider during 2006.

## APPENDIX D: COMBINED MARKET BASKET OF WIDELY USED PRESCRIPTION DRUGS

**Figure D1: Annual Percent Change in Manufacturer Prices for Most Widely Used Prescription Drugs Continues to Far Outstrip General Inflation in 2010**

