



February 12, 2026

Via Electronic Mail
Oregon Prescription Drug Affordability Board
PO Box 14480
Salem, OR 97309
pdab@dcbs.oregon.gov

Re: Selection of Lantus Solostar® for Inclusion in the 2025 Drug Review Report for the Oregon Legislature

Dear Members of the Oregon Prescription Drug Affordability Board:

Sanofi appreciates the opportunity to submit comments to the Oregon Prescription Drug Affordability Board ("OR PDAB") regarding the Board's inclusion of Lantus Solostar® in the 2025 Drug Review Report for the Oregon Legislature, pursuant to OAR 925-200-0010.

Sanofi is an R&D driven, AI-powered biopharma company committed to improving people's lives. We apply our deep understanding of the immune system to invent medicines and vaccines that treat and protect millions of people around the world, with an innovative pipeline that could benefit millions more. Our team is guided by one purpose: we chase the miracles of science to improve people's lives; this inspires us to drive progress and deliver positive impact for the communities we serve, by addressing the most urgent healthcare, environmental, and societal challenges of our time.

We are proud of the meaningful ways in which our products have transformed the standard of care for patients, from the introduction of Lantus®, which provided significant improvements in basal insulin levels, to the introduction of Toujeo®, a next generation basal insulin that more closely mimics the body's endogenous insulin secretions, among others. In addition to delivering meaningful innovation in the types of insulin available to patients, we are proud of the role we have played in transforming the patient experience through the development of devices to ease the daily burden of insulin administration, allowing for fewer injections and, in some cases, fewer refills and related patient copays. We have coupled these clinical innovations with our progressive and industry-leading pricing principles, which reflect our



commitment to sustainable pricing and transparency,¹ and a suite of innovative affordability programs to help people reduce their prescription medicine costs, regardless of their insurance status or income level.

For the reasons described below, OR PDAB's selection of Lantus Solostar® is inappropriate and inconsistent with the goal of ORS 646A.694, which is to identify products that may create affordability challenges for the health care system or high out-of-pocket costs for patients. Lantus Solostar® does not meet either of these requirements for selection, as the OR PDAB itself acknowledged during its January 21 meeting.

1. Lantus Solostar® is affordable to all Oregon patients

Sanofi believes that no one should struggle to pay for their insulin, regardless of their income level or insurance status. As part of our commitment to enabling affordable access, Sanofi continues to invest in innovative, industry-leading savings programs that lower out-of-pocket costs to patients. Each program is tailored to a specific population, and we continually listen to patients, advocates, and caregivers to better understand additional actions to address ongoing or emerging challenges.

For Medicare patients, starting in 2022, Sanofi voluntarily participated in the Centers for Medicare and Medicaid Services' (CMS') Senior Savings Model, through which Sanofi contributed enhanced discount payments that allowed patients enrolled in participating Part D plans to pay \$35 or less for each 30-day prescription of a Sanofi insulin throughout the year.² This demonstration program was codified under the Inflation Reduction Act (IRA), and since 2023, Medicare Part D plans are now required to cap out-of-pocket costs for covered insulins, including Sanofi insulins, at \$35 per month. Data from the first three quarters of 2025 shows that the average out of pocket cost was \$13 for an Oregon Medicare patient purchasing a 30-day supply of Lantus Solostar®.³

As of January 1, 2026, Sanofi also has broadly expanded eligibility for our Insulins Valyou Savings Program, through which patients can obtain a 30-day

¹ See Sanofi 2025 Pricing Principles Report, available at <https://www.sanofi.us/assets/dot-us/pages/images/our-company/Social-impact/responsible-business-values/pricing-principles/Sanofi-2025-Pricing-Principles-Report.pdf>.

² Centers for Medicare & Medicaid Services, *Part D Senior Savings Model*, CMS (last visited Jan. 9, 2026), <https://www.cms.gov/priorities/innovation/innovation-models/part-d-savings-model>.

³ Source: IQVIA Longitudinal Access and Adjudication Data. Based on Jan 2025 - Nov 2025 Utilization. Out of pocket cost is normalized for 30 days of supply.



supply of all of their Sanofi insulins, including Lantus Solostar®, for \$35, to all patients in the US with a valid prescription.⁴ The program, first created for people without health insurance, is now available to all Americans regardless of insurance status to further support affordable access to these critical medicines. Eligible low- and middle-income patients who are uninsured or underinsured can also receive their Sanofi insulin at no cost through the Sanofi Patient Connection program.⁵

Patients with commercial insurance can use Sanofi's Insulins Co-pay Savings Program, through which patients using their insurance benefit pay no more than \$35 per 30-day supply.⁶ Data from the first three quarters of 2025 shows that the average out of pocket cost for commercially insured Oregon patients purchasing Lantus Solostar® was \$15 for a 30-day supply, and 83% of commercially insured patients in Oregon paid less than \$35 for a 30-day supply.⁷

These programs, taken together, mean that no Oregon patient needs to pay more than \$35 per month, regardless of the amount or number of Sanofi insulin products received. This is even less than the newly launched insulin product from CivicaRx, which CivicaRx has suggested that pharmacies price at no more than \$55 (\$45 list price plus a \$10 pharmacy dispensing fee) for a box of insulin glargine pens.⁸

2. Lantus Solostar® is affordable to all Oregon payors

Sanofi has also taken direct pricing actions intended to improve access and affordability for patients. For example, Sanofi launched an unbranded biologic for Lantus at 60% less than the Lantus list price in June 2022. This provided payors with a lower cost option to add to formularies, which in turn could lower patient out-of-pocket costs, depending on the patient's benefit design. Despite this pioneering low-price approach, patients did not realize the potential cost savings because incentives within the health system led health

⁴ Sanofi US, *Sanofi expands patient affordability program by offering access to all its insulins for \$35 per month in the US* (Sept. 26, 2025), <https://www.news.sanofi.us/2025-09-26-Sanofi-expands-patient-affordability-program-by-offering-access-to-all-its-insulins-for-35-per-month-in-the-US>.

⁵ [Patient Medication Assistance | Sanofi Patient Connection®](#)

⁶ Savings & Copay Card | Lantus® (insulin glargine injection) 100 Units/mL, Lantus.com (last visited Feb. 2, 2026), <https://www.lantus.com/sign-up-for-savings>.

⁷ Source: IQVIA Longitudinal Access and Adjudication Data. Based on Jan 2025 – Nov 2025 Utilization. Out of pocket cost is normalized for 30 days of supply.

⁸ Civica, *Civica to Launch Long-Acting Insulin Glargine in the U.S. in January 2026* (Oct. 15, 2025), <https://civicarx.org/civica-to-launch-long-acting-insulin-glargine-in-the-us-in-january-2026/>.



plans and middlemen to favor products with high list prices and larger rebates.

To further our commitment to support patients directly at the pharmacy counter and accelerate the transformation of the U.S. insulin market, in January 2024, Sanofi reduced the list price of Lantus by 78%.⁹ For additional information regarding the steps Sanofi has taken to drive insulin affordability, please see our 2025 Pricing Principles Report.¹⁰

Although payers, including PBMs and government and private insurers, ultimately decide which medicines to cover, how much to reimburse dispensing pharmacies, and patients' out-of-pocket responsibility, Sanofi's pricing actions have reduced pharmacy reimbursement and out-of-pocket costs for these products. Unfortunately, although Sanofi continues to provide lower cost options to payers and PBMs, patients often do not realize the full cost savings due to perverse incentives within the system. Despite the policy and regulatory fervor around drug pricing, very little action has been taken to address the out-of-pocket costs patients pay at the pharmacy counter – which is dictated by health plans and pharmacy benefit managers. Sanofi supports policies that remove market distortions from the system and add oversight and accountability to protect patient interests.

3. OR PDAB is relying on outdated and incomplete data, which even the Board acknowledges does not accurately represent current market conditions

The inclusion of Lantus Solostar® among OR PDAB's list of top gross spending products is presumably a result of the number of patients who rely on these insulin products – not their prices. As demonstrated by Oregon's own 2023 data,¹¹ Lantus Solostar® is not among the highest cost insulin products on a per prescription or per patient basis across multiple metrics, including payer payments and patient out-of-pocket costs. More importantly,

⁹ In conjunction with this pricing action, Sanofi withdrew the lower priced, unbranded version of Lantus, Insulin Glargine U-100, from the market because the new list price for Lantus was below the list price of Insulin Glargine U-100. At that time, Sanofi also reduced the list price of our short-acting Apidra® (insulin glulisine injection) 100 Units/mL by 70%.

¹⁰ Sanofi 2025 Pricing Principles Report: Action Driving Insulin Affordability, *available at* https://www.sanofi.us/assets/dot-us/pages/images/our-company/Social-impact/responsible-business-values/pricing-principles/Sanofi-2025-Pricing-Principles-Report_Action-Driving-Insulin-Affordability.pdf.

¹¹ See Insulin Preliminary Data, Oregon PDAB Data Dashboard, *available at* https://dfr.oregon.gov/pdab/Documents/DRAFT_2026_Drug_Review_Insulin_Preliminary_List_v01.xlsx.



OR PDAB's data does not reflect the 78% price reduction of Lantus Solostar® that took effect in January of 2024. Indeed, healthcare providers and patients choose Sanofi's insulin glargine products because of their well-established clinical benefits and their affordability. Given these utilization and cost trends – even using 2023 data, neither Lantus Solostar® nor any of Sanofi's insulin glargine products are an appropriate target for the OR PDAB.

No better evidence exists than the Board's initial failure to identify a single insulin product as unaffordable in the formal vote at the January 21 meeting. During the January 21 discussion, OR PDAB members even acknowledged that the 2023 data simply does not accurately reflect current patient out-of-pocket costs, utilization, and payer spending for the insulin glargine products included in the review list. OR PDAB should not include Lantus Solostar® or any insulin product in its drug review report unless it can review current data that reflects these changes to determine whether Lantus Solostar® or any insulin product in fact meets the statutory requirements for selection.

Moreover, Oregon law requires agencies to engage in reasoned decision-making, which is notably absent from OR PDAB's selection of Lantus Solostar®. The decision-making record developed by an agency must "permit a reasonable person to make" the same finding as the agency and the agency must have articulated a "rational connection between the facts and the legal conclusion" that the agency draws from them.¹² The record here falls short of this standard. As noted above, OR PDAB members initially voted not to select any insulin product for affordability review, apparently concluding that none of the insulins under consideration raised affordability concerns. Only after a staffer stated their view that the statute requires selection of at least one insulin (more on this interpretation below) did the Board reverse course and select Lantus Solostar®. In explaining that decision, OR PDAB members referenced unspecified prior discussions, expressed generalized concern about Lantus Solostar®, and made a cryptic statement that other insulins had "very low low numbers," without identifying the data referenced, the statutory factors implicated, or how Lantus Solostar® differed materially from other insulin products.

Finally, OR PDAB statute's directive that the OR PDAB "shall identify nine drugs and at least one insulin product" is qualified by the clause "that the board determines may create affordability challenges." Therefore, read together, the statute requires an actual affordability-related determination as a prerequisite to any selection—including the selection of any insulin product.

¹² *Dorn v. Teacher Standards & Prac. Comm'n*, 316 Or. App. 241, 247 (2021).



As noted above, the PDAB has not explained or supported its selection of Lantus Solostar®.

For these reasons, Sanofi respectfully requests that the Board remove Lantus Solostar® from the 2025 Drug Review Report for the Oregon Legislature. Any further consideration of insulin products should, at a minimum, take into account updated data and market conditions before proceeding with any insulin product review.

Please feel free to contact me at with any questions at carissa.kemp@sanofi.com or (208) 954-6330.

Sincerely,

Carissa Kemp

Lead, State Government Relations, Sanofi

Enclosures:

Sanofi 2025 Pricing Principles Report – Action Driving Insulin Affordability

Sanofi Expanded Savings Program Available for Commercial, Medicare, and Uninsured Patients