



March 26, 2025

The Honorable Joseline Pena-Melnyk  
Chair, Health & Government Operations Committee  
241 Taylor House Office Building  
Annapolis, MD 21401

The Honorable Bonnie Cullison  
Vice Chair, Health & Government Operations Committee  
241 Taylor House Office Building  
Annapolis, MD 21401

**RE: SB 773 – Copay Accumulator Program Reform**

To the Maryland Assembly Health & Government Operations Committee,

On behalf of the Vision Health Advocacy Coalition, I am writing to support SB 773. For Maryland residents, this legislation would ensure patients with vision conditions can access and afford their medical treatments by ensuring they can utilize copay assistance without fear of surprise out-of-pocket costs.

The [Vision Health Advocacy Coalition](https://www.visionhealthadvocacy.org/) (VHAC) promotes patient-centered policies that make life-changing treatments, services, and devices more accessible for people with vision conditions such as thyroid eye disease, glaucoma, Sjögren's, dry eye, macular degeneration, and diabetic retinopathy. Through our network of member organizations, VHAC encourages the advancement of ocular science and innovation, educates patients, healthcare providers, and policymakers about access challenges, promotes better vision care delivery, and advocates for access to prevention and appropriate treatment for all patients.

**Copay Accumulator Programs in Maryland Threaten Access to Treatment for Vision Patients**

Copay assistance is third-party financial assistance, often from manufacturers, that help patients meet their cost-sharing requirements. Copay assistance lowers patients' costs at the pharmacy counter and assists patients in meeting their deductible, or annual out-of-pocket cost limit, by acting as payment toward a patient's prescription cost-sharing requirements. However, many insurance policies implement "copay accumulator programs," which prohibit third-party payments from counting toward a patients' deductible. In turn, this creates barriers for patients by restricting the benefits that copay assistance can provide.

For patients with vision conditions, copay accumulator programs are dangerous and threaten a patient's quality of life. These programs frequently lead to surprise out-of-pocket costs due to the copay assistance programs disallowing the patient payment made with third-party assistance to count toward the patients' annual deductible. These copay accumulator programs may force vision patients to ration medications and discontinue treatment altogether, which can ultimately lead to vision loss or irreversible blindness.

**SB 773 Protects Maryland Residents Against Surprise Out-of-Pocket Costs**

SB 773 would support patients by ensuring all payments made on behalf of an insurance plan member, including those made with third-party assistance, are counted toward the patient's out-of-pocket maximum, protecting affordability and accessibility. This would allow patients to manage their vision conditions and maintain medication access.

On behalf of the Vision Health Advocacy Coalition and our membership, we urge your support for SB 773 to protect patients with vision conditions. If we can provide further details or answer any questions, please get in touch with Olivia Perry at [operry@allianceforpatientaccess.org](mailto:operry@allianceforpatientaccess.org).

Sincerely,

*Olivia Perry*

Olivia Perry  
Coalition Director  
Vision Health Advocacy Coalition

**Co-Signing Organizations:**

Alliance for Patient Access  
American Macular Degeneration Foundation  
Autoimmune Association  
Diabetes Policy Collaborative  
Dry Eye Foundation  
Endocrine Nurses Society  
Future Leaders in Sight  
Infusion Access Foundation  
Lupus and Allied Diseases Association, Inc.  
Macular Degeneration Association  
National Alliance for Eye and Vision Research  
Prevent Blindness  
Sjögren's Foundation, Inc.  
TED Community Organization  
U.S. Pain Foundation  
VisionServe Alliance