

CAPITOL STREET

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MFN In Fertility

PBMs Feature in IVF Deal; 9 New FDA Voucher Candidates Announced

Relevant Companies



Johnson & Johnson

REGENERON

CVS Health

»» Our Take & Next Up

MFN is being leveraged to advance the administration's other policy priorities as today's agreement with EMD Serono focused on fertility. See fact sheet [here](#). The [agreement](#) for EMD Serono is limited largely to their fertility products and includes access through TrumpRx (starts Jan 2026). The deal structure follows agreements reached with AZN and with PFE, including MFN price commitments in Medicaid, availability through TrumpRx for DTC discounts, and exemption from pharma tariffs.

A new feature of this deal are voluntary PBM commitments (CVS, CI) to (or close to) MFN pricing. The Trump administration noted that 2 major PBMs (CVS, CI) have agreed to lower their pricing for selected fertility treatments.

The Trump administration also announced nine pilot products for the Commissioner's National Priority Voucher (CNPV) program today. The FDA announced nine candidates, including Pergoveris (EMD Serono), for the CNPV program and expects to announce another group of CNPV recipients in the coming months.

Our take on the PFE deal [here](#). We are still waiting on the CMMI models (GUARD and GLOBE), which remain pending at the OMB. See our analysis of GUARD [here](#) and our take on GLOBE [here](#). The next announcements could come from MRK, JNJ, LLY, Regeneron, or ABBV, and we could see other PBM commitments highlighted during these announcements.

»» Key Points

The third MFN deal announced today with EMD Serono focuses on fertility products. The structure of the [deal](#) follows the Pfizer and AZN deals. EMD Serono's fertility drugs (Gonal-F, Ovidrel, Cetrotide) will be offered at a discount on TrumpRX, starting in 2026. EMD Serono will be also excluded from 232 tariffs. Additional MFN announcements are pending. Eli Lilly is in the mix, as may be Regeneron, AbbVie and others such as Merck and Johnson & Johnson.

The FDA also [announced](#) nine candidates for the Commissioner's National Priority Voucher (CNPV) program today, with approvals in "weeks instead of a year." Commissioner Makary stated these products could be approved in a matter of weeks. The FDA's new Commissioner's National Priority Voucher (CNPV)

includes MFN pricing as a key program priority (although not every product selected has to commit to MFN pricing). We note that the FDA does not have jurisdiction over pricing and coverage falls under CMS's purview. Any pricing commitments made are voluntary. See our analysis of CNPV [here](#).

- Pergoveris (Merck KGaA/EMD Serono),
- Teplizumab (SNY),
- Cytisinicline (ACHV),
- DB-OTO (REGN),
- Cenegermin-bkjb (Dompé Pharma),
- RMC-6236 (RVMD),
- Bitopertin (IRON),
- Ketamine for domestic manufacturing of a critical drug for general anesthesia (generics),
- Augmentin XR (USAntibiotics).

PBMs (CVS, CI) are also committing to (or are committing close to) MFN prices. Dr. Oz noted today that both CVS and Express Scripts will lower their pricing for selected fertility products along with today's MFN pricing announcement. We could see PBMs committing to additional discounts as more agreements are announced.

A new fertility benefit was also announced that employers can start offering immediately, offering a potential boost for fertility benefit firms like PGNY. Administration officials say the Departments of Labor, Health and Human Services, and Treasury will soon issue guidance establishing, for the first time, a legal framework for employers to offer fertility benefits. Like dental, vision, and life insurance, these benefits will eventually be formalized through rulemaking. They aim to cover the full spectrum of fertility needs, including IVF, along with addressing underlying causes, which is a focus of Secretary Kennedy's MAHA initiative. Officials emphasized that this coordinated package goes beyond what traditional health insurance currently provides.

BACKGROUND & OUTLOOK

Key principles of the MFN negotiation deals remain consistent across deals: (1) direct access at TrumpRx (cutting out PBMs) in the self-pay market, (2) MFN prices for Medicaid, (3) pricing parity internationally for all newly launched drugs, (4) trade involvement to get other countries to pay more, and (5) commitments for domestic manufacturing. As a tradeoff, manufacturers are likely to be protected from tariffs as a result of MFN agreements.

- On Sept. 30, Trump announced the first MFN agreement with Pfizer. See our analysis [here](#). PFE's agreement included a 3 year grace period from 232 tariffs and a commitment from the company that they will invest \$70 B in US manufacturing and research over the next few years.
- On Oct. 10, Trump announced the second MFN agreement with AstraZeneca. The AZN deal is structured in the same format as the PFE deal, including MFN for Medicaid, international pricing parity for new launches, a 3 year grace period, and a commitment by AZN to invest \$50B in US manufacturing and R&D. See press release [here](#).

MFN in Medicaid is not likely to impact 340B discounting. The signed agreements between the government and PFE and AZN are not public. MFN in Medicaid is likely to be structured as a supplemental rebate and will not trigger a lower 340B ceiling price or an increase the statutory 340B discount ([here](#)).

We are also waiting on the two CMS drug pricing models (likely mandatory and likely impact Medicare & Medicaid). We believe that the pending CMMI models (GUARD and GLOBE; at OMB [here](#)) are likely to be mandatory models similar to the 2020 MFN model. However, unlike 2020, the administration has likely learned from industry pushback and are expected to implement the demos with notice and comment rulemaking. There is mention of a third demo, but we have no detail of it as of now ([here](#)). See our recent thoughts on potential demos [here](#).

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