

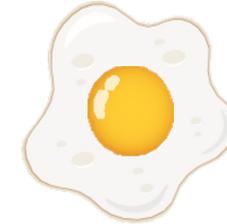
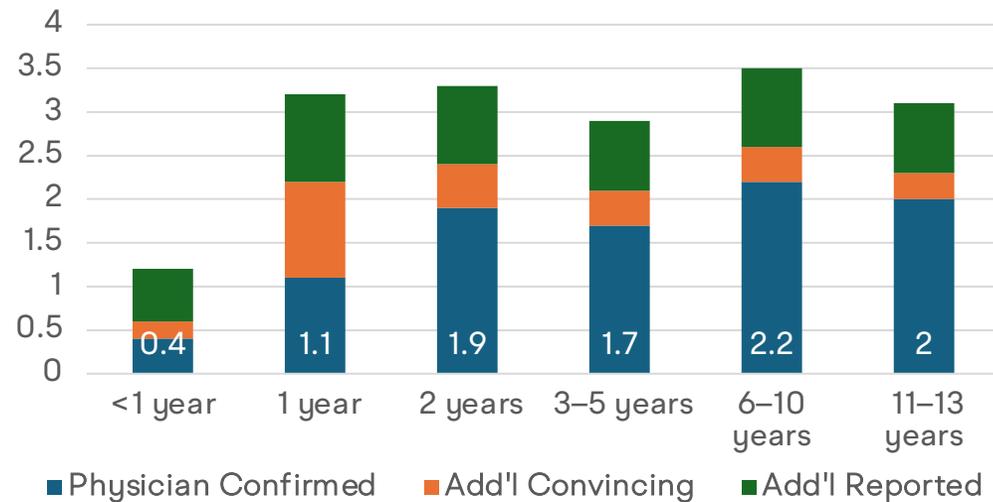
Written Testimony to Senate Policy Committee

Feb 17th, 2026

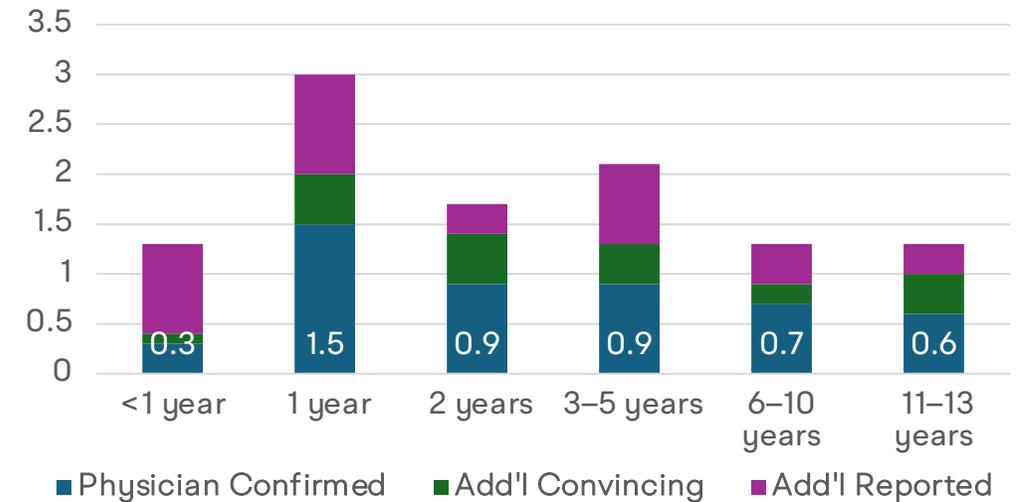
Egg Allergy is Now More Common than Peanut



Prevalence of Peanut Allergy by Age and Case Definition in the US Population



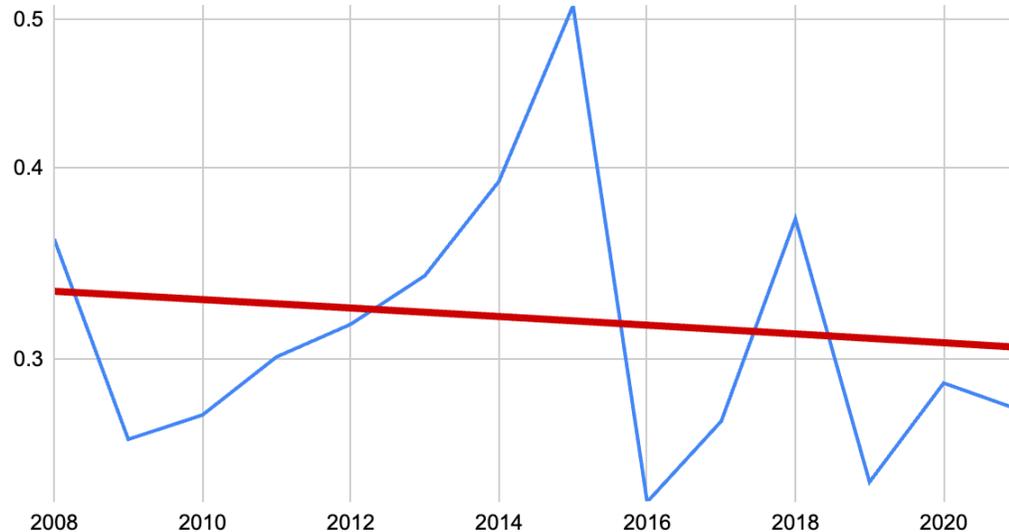
Prevalence of Egg Allergy by Age and Case Definition in the US Population



Samady W, Warren C, Wang J, Das R, Gupta RS. Egg Allergy in US Children. J Allergy Clin Immunol Pract. 2020;8(9):3066-3073.e6. doi:10.1016/j.jaip.2020.04.058

Egg Consumption Suffers

Egg Consumption Per Capita



- Egg allergy rates have soared since 1990
- Egg consumption has fallen in-favor of “egg-free” or “vegan” foods

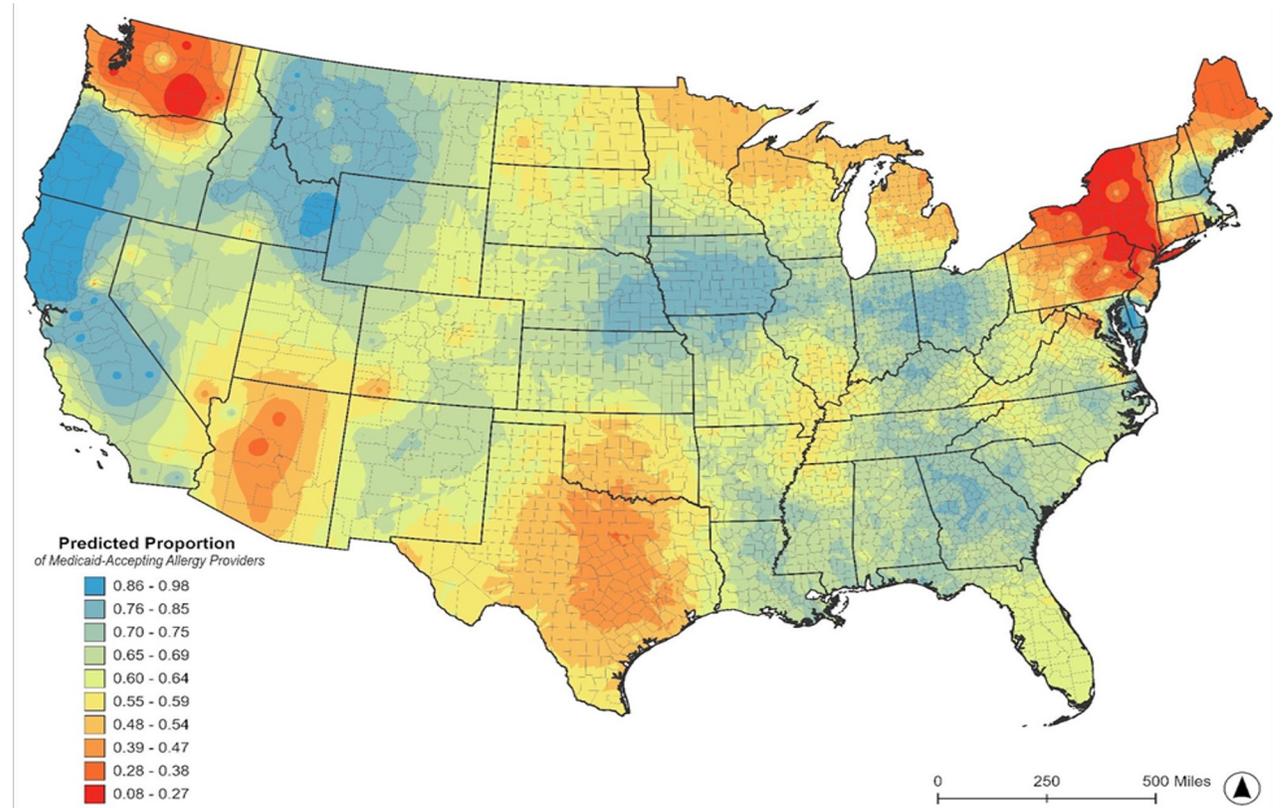
BUT...

- Egg allergy is a preventable disease
- Eggs are a healthy food, especially for infants
- American children should be eating eggs

Preventing Egg Allergy Will Put Eggs Back on Every Table

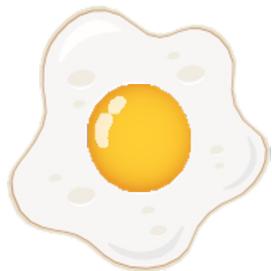
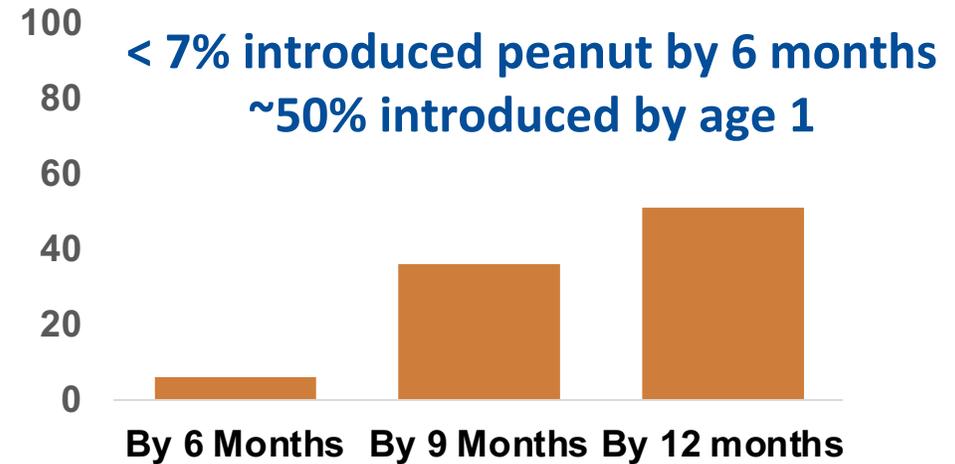
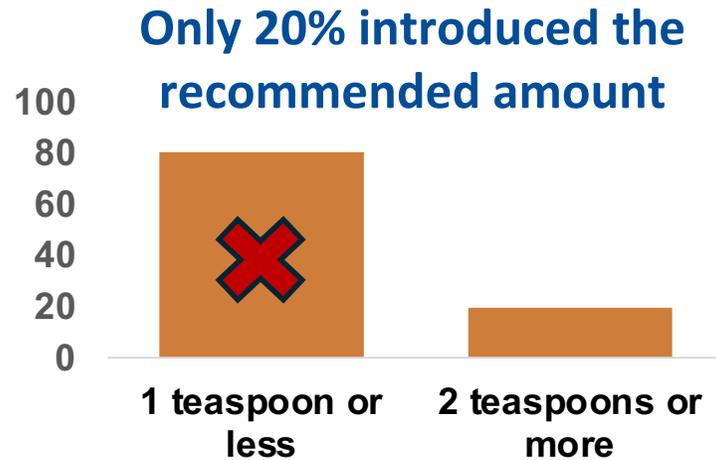
Food Allergy Uniquely Burdens Rural Patients

- 50% of US Counties have NO practicing allergists
- Waiting lists > 1 year
- Families travel > 3 Hours
- Only 55.5% of allergists accept Medicaid nationwide



Ho F Geographic Variability of Medicaid Acceptance Among Allergists in the United States. Under Review. Health Services Research.

Caregiver Compliance: Too Little, Too Late



Caregivers Cite:

- Lack of access to foods
- Fear of reactions
- Confusion on safe preparation

Warren CM. Knowledge, Attitudes and Behaviors Regarding Peanut Protein Introduction During Infancy—a US population-based survey. Presented at 2022 Meeting of the Pediatric Academic Societies

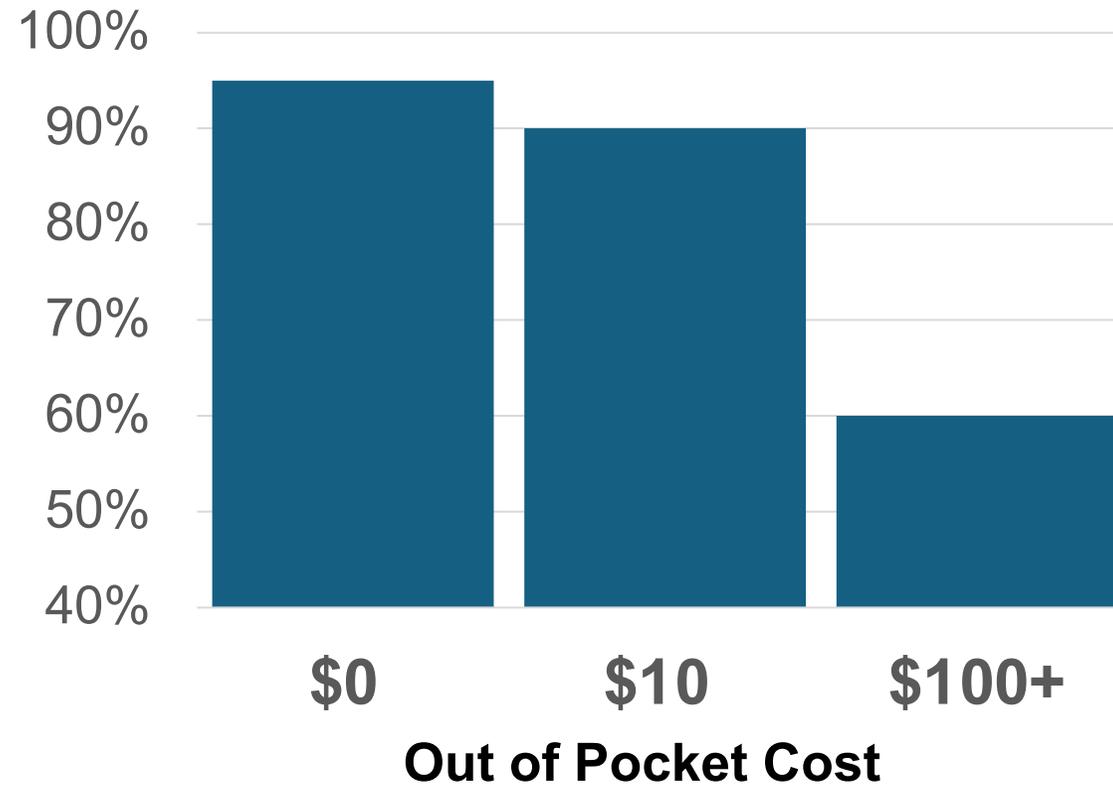
Early Introduction Is Not Covered By WIC

- **No Peanuts or Eggs** for Age 6-12 Months on WIC
- WIC budget is constrained; and...
- **WIC does not save \$ if allergy rates fall**



Preventive Medicine is Price Sensitive

**% of Patients Who Will Fill a Prevention
Script By Co-Pay Amount**



Dean LT, et al. Estimating The Impact Of Out-Of-Pocket Cost Changes On Abandonment Of Prophylaxis. Health Affdoi:10.1377/hlthaff.2023.00808

Meenal Lele Written Testimony to Senate Policy Committee Feb 17th 2026

Food vs Supplement: Definition

Dietary Supplement Health and Education Act of 1994 Public Law 103-417 103rd Congress

“§3. Definitions.

(a) Definition of Certain Foods as Dietary Supplements. Section 201 (21 U.S.C. 321) is amended by adding at the end the following:

“(ff) The term “dietary supplement” -

- “(1) means a product **intended to supplement the diet** that bears or contains one or more of the following dietary ingredients:
 - “(A) a vitamin; “(B) a mineral; “(C) an herb or other botanical; **“(D) an amino acid;** “(E) a dietary substance for use by man to supplement the diet by increasing the total dietary intake; or
 - “(F) a concentrate, metabolite, constituent, extract, or combination of any ingredient described in clause (A), (B), (C), (D), or (E);
- “(2) means a product that -
 - “(A)(i) is intended for ingestion in a form described in section 411(c)(1)(B)(i); or
 - “(ii) complies with section 411(c)(1)(B)(ii);
 - **“(B) is not represented for use as a conventional food or as a sole item of a meal or the diet;** and
 - “(C) is labeled as a dietary supplement; and

Except for purposes of section 201(g), **a dietary supplement shall be deemed to be a food** within the meaning of this Act.”

Food vs Supplement: Cost Comparison

Early Peanut Introduction

| Option | 6 Month RX | Comments |
|---|--------------------------------|--|
| Creamy Peanut Butter (Jif, Skippy, etc) | \$5-10 for 34 oz | <ul style="list-style-type: none"> Requires education Choking hazard if misused |
| Peanut Powder (PB2, Lil Mixins) | \$10-40 for 10oz | <ul style="list-style-type: none"> Varying labeling for adult / infant use Supplement option |
| Peanut Puff (Bamba, Mission Mighty) | \$80-\$120 for 64 packs | Potentially multiple Rx due to volume |

Early Egg Introduction

| Option | 6 Month RX | Comments |
|---------------------------------|------------------------------|---|
| Shelled Hard Boiled Eggs | mkt price, \$64-\$100 | <ul style="list-style-type: none"> Weekly Rx Spoilage, waste Requires education |
| Cooked Egg Powder (Lil Mixins) | \$40 for 10oz | <ul style="list-style-type: none"> Supplement option |

Insurance Coverage Has Precedent



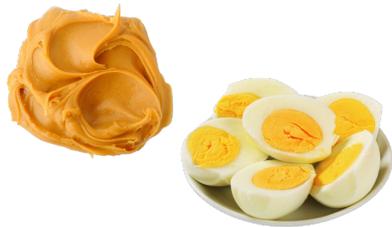
Prenatal Vitamin (1995)

- Dietary Supplement, no FDA approvals
- Delivery mechanism for 400 IU Folic Acid
- Prevents Neural Tube Defects



Insect Repellent (2013)

- No FDA approval
- Delivery mechanism of DEET, etc
- Prevents Zika Infection, subsequent Encephalitis



Early Peanut & Egg Introduction (2024)

- Dietary Supplement
- Delivery mechanism of 2g infant-safe peanut / cooked-egg protein
- Prevents Lifelong Food Allergy

Highmark Agrees Mandates Are Required

Date: October 10th 2025

Location: Video Call

Attendees: Dr. Matthew Fickie, Senior Medical Director at Highmark; Mike Yantis in Government Affairs; William Freeman in government affairs; and Dr. Kelly Cleary the Chief Medical Officer of FARE

Dr. Fickie confirmed that for dietary supplements or medical foods, there is no path to insurance coverage other than a mandate. Every non-drug they cover (supplement or medical food) has a mandate.

He also confirmed that a peanut puff or powder supplement, and a well-cooked egg powder supplement, would meet their internal definition of medical necessity given that the randomized controlled trials used those products.

Early Introduction Saves Money

| | Per 1M Covered Persons |
|---|--|
| Infants Born Per Year | 11,400 |
| Cost (At MAX \$100 cost per lifetime) | \$1,140,000 (First Year Only) |
| Number of Allergies Diagnosed | Baseline: 912 After Intervention: 219 Allergies Prevented: 693 |
| Yearly Spend on Allergies per birth year cohort (Assumes \$2,081 per year*) | Baseline: \$1,897,882 After Intervention: \$455,489 Yearly Savings Per Cohort: \$1,442,383 |
| Time to Breakeven* | 9 months |

Highmark's Estimate of Cost

Highmark
stated the cost
of coverage
would be \$0.01
pm/pm

From: Price, Pamela V (Highmark Inc) <Pamela.V.Price@highmark.com>
Sent: Friday, September 26, 2025 4:20 PM
To: Richards, Justin (LegHall) <Justin.Richards@delaware.gov>
Cc: Williams, Kimberly (LegHall) <Kimberly.Williams@delaware.gov>
Subject: Re: HB 274, Food Allergy Prevention

Hi Justin,
We estimated that this would have a very low cost impact, \$.01 -.02 pm/pm.

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

From: Richards, Justin (LegHall) <Justin.Richards@delaware.gov>
Sent: Friday, September 26, 2025 4:12:24 PM
To: Price, Pamela V (Highmark Inc) <Pamela.V.Price@highmark.com>
Cc: Williams, Kimberly (LegHall) <Kimberly.Williams@delaware.gov>
Subject: [EXTERNAL] HB 274, Food Allergy Prevention

WARNING: This email originated from an external source and could contain harmful links or attachments. Use extreme caution. Report this to phishing@highmark.com if you suspect this is a harmful email.

Hi Pam,

Hope you're doing well and Happy Friday! Rep. Williams wanted to see if you could provide Highmark's cost analysis regarding HB 274 from the 152nd GA. This was the food allergy prevention legislation.