EACH PIC COALITION

August 18, 2025

Oregon Prescription Drug Affordability Board
Department of Consumer and Business Services
350 Winter Street NE
Salem, OR 97309-0405

RE: Public Comments on Affordability Review Meeting on August 20

Dear Members and Staff of the Oregon Prescription Drug Affordability Board:

The Ensuring Access through Collaborative Health (EACH) and Patient Inclusion Council (PIC) is a two-part coalition that unites patient organizations and allied groups (EACH), as well as patients and caregivers (PIC), to advocate for drug affordability policies that benefit patients.

We appreciate your continued efforts to strengthen Oregon's drug affordability review process. However, we are concerned that the current affordability review process is moving too quickly and without a clear, patient-centered foundation.

The board is still finalizing its methodology for evaluating affordability, yet the review process is already halfway complete. During the last meeting, several members expressed uncertainty about how affordability is being assessed. This lack of clarity risks inconsistent determinations and undermines public trust in the process.

Equally troubling is the limited time available for meaningful discussion of each drug under review. During the July meeting, only a cursory conversation was held on the first six drugs under review due to time constraints. When a board member asked if more time could be allotted, the answer was that the evaluation could be done individually, outside of public discussion. This approach risks reducing transparency, undermining deliberation, and diminishing the value of public participation.

Further, public surveys to date have had low participation rates, making it unclear how patient perspectives will be incorporated. Findings from our recent Patient Experience Survey underscore why a deliberate, transparent process is critical. Affordability is often shaped less by the drug's price and more by insurance barriers, cumulative health costs, and individual life circumstances. Many patients paying $0–$10 per month still reported unaffordability due to denials, utilization management, or other access challenges.

These realities must be built into the board's criteria before reviews move forward. The board should extend outreach, keep surveys open until robust participation is achieved, and expand beyond three-minute testimony to include patient roundtables or listening sessions for deeper insight. Only by starting with patient input can the board appropriately address patient needs.

Broadly, the process has become rushed and overly complicated. For these reviews to achieve their intended purpose, improving drug affordability for Oregonians, they must be deliberate, transparent, and based on clear, shared criteria. We urge the Board to slow down, revisit its

process, and ensure that both its methodology and meeting structure support thorough, informed evaluation.

Thank you for your continued commitment to improving drug affordability in Oregon. We appreciate the opportunity to provide this feedback and look forward to continuing our engagement with the board.

Sincerely,

Tiffany Westrich-Robertson
tiffany@aiarthritis.org
Ensuring Access through Collaborative Health (EACH) Coalition Lead

Vanessa Lathan
vanessa@aiarthritis.org
Patient Inclusion Council (PIC) Coalition Lead