



May 13, 2026

Maryland Prescription Drug Affordability Board
16900 Science Drive, Suite 112-114
Bowie, MD 20715

RE: Comments on Cost Review Rulemaking Procedure

Dear Members and Staff of the Maryland 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 the board's decision to extend the public comment period for the proposed rulemaking on changes to the cost review process. However, this extended timeline remains an exception rather than the standard.

The board has too often advanced rulemakings with only a 14-day comment period, which effectively provides stakeholders with 10 business days or fewer to review complex proposals and develop meaningful feedback. We have long urged the board to adopt a minimum 30-day comment period for all rulemakings and continue to encourage the board to establish that standard moving forward.

We also appreciate the opportunity to learn more about the proposed changes during the upcoming meeting. Additional discussion of the proposed rule, the rationale behind the changes, and staff recommendations will help stakeholders and board members alike engage more meaningfully in the process and provide more informed feedback.

We encourage the board to use this process as a model for a more consistent and transparent approach to future rulemakings. Specifically, we urge the board to establish a standard process that includes:

- Initial presentation by board staff of a proposed rule during a regularly scheduled board meeting;
- A minimum 30-day public comment period;
- Formal review and discussion of submitted comments during a public board meeting; and
- Final board deliberation and vote.

A process structured in this manner would promote stronger deliberations, more constructive stakeholder engagement, and greater transparency into board decision-making. We thank the board for its consideration of our comments.

Sincerely,

Sifany Westrich-Robertson



Tiffany Westrich-Robertson

tiffany@aiarthritis.org

Ensuring Access through Collaborative Health (EACH) Coalition Lead

A handwritten signature in black ink that reads "Vanessa Lathan". The signature is written in a cursive, flowing style.

Vanessa Lathan

vanessa@aiarthritis.org

Patient Inclusion Council (PIC) Coalition Lead