



April 30, 2025

Via Electronic Correspondence

Shelley Bailey, MBA
Chair, Oregon Prescription Drug Affordability Board
Department of Consumer and Business Services
350 Winter Street NE
Salem, OR 97309

RE: Drug Affordability Review Process

Dear Chair Bailey:

Aimed Alliance is a not-for-profit health policy organization that seeks to protect and enhance the rights of healthcare consumers and providers. We appreciate the Oregon Prescription Drug Affordability Board's ("Board") commitment to addressing the rising cost of prescription drugs for Oregon patients. As the Board continues to move forward with its affordability review process, we urge it to ensure that all decisions are evidence-based and that patient feedback is meaningfully prioritized and integrated throughout the process.

I. Ensure Accurate and Sufficient Data Interpretation

Aimed Alliance commends the Board for its decision last year to pause affordability reviews in order to further refine its review criteria and methodologies. This action acknowledges the novelty of prescription drug affordability boards (PDABs) and reflects an understanding that developing an effective process to improve prescription drug affordability requires time, deliberation, and care.

In contrast, other states currently moving forward with affordability reviews, such as Colorado and Maryland, have accepted public feedback but have often failed to reconcile it with the PDAB's ultimate decision. For example, in a recent Maryland PDAB meeting, board members expressed frustration with how time-consuming it was to collect feedback on the first three elements of the cost-review study.¹ Certain members also stated that they "didn't care" about the additional reporting requirements that were intended to ensure the board has a monitoring system in place to address patient access challenges that are created by UPLs. In justifying their lack of interest, the member stated, "no one reads any of those reports."

Similarly, in the April 2025 Colorado PDAB meeting, the board recognized that certain data had been mischaracterized when submitted by a PBM, resulting in confusion of data sets relating to Medicare and commercial plans.² However, the CO board clarified that this incorrect data would not impact the affordability reviews. For consumers and advocates, it did not seem clear how this mischaracterized data would not negatively influence the review processes.

¹ Maryland Prescription Drug Affordability Board Meeting 03242025, <https://www.youtube.com/watch?v=DEhLIYpB8gk&t=2398s>.

² Partnership for Safe Medicines, <https://www.safemedicines.org/2025/04/pdab-activity-apr-2025.html#CO>.



While Aimed Alliance appreciates the complexity of these processes, disregarding consumer feedback and safeguards intended to protect consumers erodes public trust in these processes and jeopardizes the willingness of consumers to continue to engage with these entities.

As such, Aimed Alliance urges the OR Board to maintain its same level of caution and intentionality as it proceeds with the drug affordability review process. Ensuring both the accuracy of data used during the cost review process and the sufficiency of survey responses, including from diverse patient representatives. Moreover, conclusions regarding affordability drawn from an unrepresentative sample could potentially lead to decisions that do not accurately reflect the lived experiences of Oregon patients. Therefore, we urge the Board to ensure its cost reviews prioritize deliberate, evidence-based cost reviews and decision-making.

II. Prioritize the Patient Voice During the Affordability Review Process

We appreciate the Board's commitment to incorporating the patient voice into the cost review process. Patients are the individuals most directly impacted by affordability determinations, yet their perspectives are too often underrepresented in healthcare decision-making. Therefore, we urge the Board to not only engage with patients through information surveys and public comment periods, but to also meaningfully integrate and reconcile patient-reported feedback and data with its final affordability determinations. Reconciling decisions with feedback informs consumers of how their information was helpful and encourages consumers to continually engage with these processes.

This will also help ensure that those most affected by these decisions are genuinely represented and increase the likelihood that the Board's actions meaningfully address the prescription drug affordability challenges faced by Oregonians.

III. Conclusion

In conclusion, we commend the Board for its leadership in refining its methodologies to ensure an effective and transparent process. Aimed Alliance further urges the Board to maintain a thoughtful, evidence-based approach to drug affordability reviews that centers patient experience and utilizes robust patient data.

We look forward to continued engagement as the Board conducts its affordability reviews. If you have any questions or wish to discuss these matters further, please contact us at policy@aimedalliance.org.

Sincerely,

Olivia Backhaus
Staff Attorney