



July 23, 2025

Via Electronic Correspondence

Van T. Mitchell
Chair
Maryland Prescription Drug Affordability Board
16900 Science Drive, Suite 112-114
Bowie, MD 20715

RE: Drug Affordability Review Process

Dear Chair Mitchell:

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 Maryland Prescription Drug Affordability Board's ("PDAB" or "Board") commitment to addressing the rising cost of prescription drugs for Maryland patients. As the Board continues to move forward with its affordability review process for Farxiga and Jardiance, 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

While we recognize the complexity of conducting affordability reviews, we are concerned that disregarding consumer input and the safeguards designed to protect patients may erode public trust in the Board's work and discourage future engagement. Although the Board has provided opportunities for public comment, we urge that this feedback not only be received but carefully considered in decision-making.

For example, during the Board's March meeting, members expressed frustration with the time-consuming nature of gathering feedback on the first three elements of the cost-review study. Notably the Chair dismissed additional reporting requirements, which are designed to monitor patient access challenges stemming from upper payment limits ("UPLs"), saying he "doesn't care" as "no one reads any of those reports."¹ Comments like these are troubling, particularly from the Chair, as they suggest transparency and accountability measures that are vital to maintaining public essential to maintaining public trust in the Board and ensuring that it fulfills its role in promoting affordability.

Similar concerns have arisen elsewhere. In the April 2025 meeting of the Colorado PDAB, members acknowledged that data submitted by a pharmacy benefit manager (PBM) had been mischaracterized, creating confusion between Medicare and commercial data sets. Although the Board claimed this error would not affect its affordability reviews, it remained unclear to advocates and consumers how this mischaracterized data would not negatively influence the

¹ Maryland Prescription Drug Affordability Board Meeting 03242025, at 1:37,
<https://www.youtube.com/watch?v=DEhLIYpB8gk&t=2398s>.



review processes. By comparison, the Oregon PDAB opted last year to temporarily pause its affordability reviews to refine its criteria and methodologies. This deliberate step reflects an understanding of the novelty and complexity of PDAB processes and a recognition that meaningful drug affordability reforms require careful development and thoughtful implementation.

As such, Aimed Alliance urges the Board to exercise 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 patient participation, 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 Maryland 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. As such, Aimed Alliance urges 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 Maryland patients.

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