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PDAB Action Center

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**National Groups:**

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(HEAL) Group

Industry Advisory Group (IAG)

National ADAP Working Group (NAWG)

August 17, 2025

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

**RE: Drug Reviews**

Dear Honorable Members of the Oregon Prescription Drug Affordability Board,

The Community Access National Network (CANN) is a 501(c)(3) national nonprofit organization focusing on public policy issues relating to HIV/AIDS and viral hepatitis. CANN's mission is to define, promote, and improve access to healthcare services and support for people living with HIV/AIDS and/or viral hepatitis through advocacy, education, and networking.

While CANN is primarily focused on policy matters affecting access to care for people living with and affected by HIV, we stand in firm support of all people living with chronic and rare diseases and recognize the very reality of those living with multiple health conditions and the necessity of timely, personalized care for every one of those health conditions. State Prescription Drug Affordability Boards are of profound importance to our community.

**Process Remains Unclear**

At this point in the Board's deliberations, it was presented that affordability drug review discussions for multiple drugs would occur at each meeting in preparation for final determinations at the end of the year. Numerous stakeholders and board members had previously raised concerns about the number of reviews that were going to be executed, worrying that there would not be sufficient time for thorough affordability analysis.

After the July 2025 meeting, that remains a concern. During the that meeting, there was a robust discussion about the construction of the information packets and how the vast amounts of data included in the packets were not organized in a way that facilitated meaningful analysis. Board members also highlighted discrepancies in the data, including issues with the net and gross spend data, that need to be addressed before conclusions can be drawn appropriately, as the calculations and formulas were incorrect.

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Most importantly, several board members highlighted that there is still no established board paradigm for affordability and no agreed-upon metrics to use in making affordability determinations. One example of unresolved deliberation was the question of how to utilize APAC versus Data Call data in determining affordability and impact.

There are a couple more meetings before the Board is slated to vote on nine drugs, plus an insulin product, to be deemed unaffordable in November. In light of the nebulous outcome of the first drug reviews, it is unclear at this juncture how these additional drug reviews will result in a robust affordability analysis of the impact on patients and the system for the drugs from the first meeting and all the remaining drugs on the docket.

We appreciate the time and energy the Board has been putting into attempting to engage in careful discussion, and its desire to “get it right this time”. However, presently, the outcome of the current trajectory of deliberations is unclear.

Respectfully submitted,



Ranier Simons  
Director of State Policy, PDABs  
Community Access National Network (CANN)

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On behalf of  
Jen Laws  
President & CEO  
Community Access National Network