



December 11, 2025

Sean O'Day, Director
Department of Consumer and Business Services
350 Winter Street NE
Salem, OR 97309-0405

Dear Director O'Day,

I am writing to provide our comments and recommendations for the Drug Price Transparency Program (DPTP). The Caring Ambassadors Program is a national nonprofit advocacy organization based in Oregon City, Oregon. Caring Ambassadors has empowered patients to be advocates for their health since 1997. We provide education, support, and advocacy for people living with chronic diseases, focusing on lung cancer and hepatitis C. I sincerely appreciate your commitment to improving access to affordable healthcare for all Oregonians.

As an active participant in years of legislative debate and the Oregon Prescription Drug Affordability Board (PDAB), I appreciate that you recognize the complexity of the supply chain and that change must occur at every step to lower healthcare costs in Oregon. However, we remain concerned about the process. The DPTP and the PDAB put forth year after year the same or very similar PBM policy recommendations, but the legislature has not enacted them. The time for PBM reform is now.

Meaningful PBM reforms, especially policies that delink PBM compensation from the cost of medications and ensure that all supply-chain savings benefit Oregonians, not corporate middlemen. PBMs play a significant role in our healthcare system, yet their practices often hurt local pharmacies and prioritize profits over patient outcomes. Their opaque pricing schemes, rebate structures, and reimbursement practices hinder patient access to affordable medications. Congressional hearings in DC and in Oregon have detailed how PBMs are the driving force behind escalating drug costs for consumers and employers, using their control of the marketplace and drug formularies to drive patients toward higher-priced drugs and restrict access to less expensive generics and biosimilars. The EACH/PIC Survey revealed that, for patients facing affordability challenges, the type of benefit plan was the primary determinant of affordability.¹ The PDAB is not going to lower costs for the system or out-of-pocket costs for Oregonians; meaningful PBM reform will.

We appreciate the Drug Price Transparency Program's efforts and the complexity of the task before you.

Sincerely,

A handwritten signature in black ink, reading "Lorren Sandt".

Lorren Sandt, Executive Director

¹.Patient Experience Survey: Prescription Drug Affordability and Unaffordability