



TO: Jesse Ellis O'Brien  
Senior Policy Analyst  
Oregon Department of Consumer and Business Services Division of Financial Regulation

FR: Courtney Helstein, on behalf of the  
Oregon Coalition for Affordable Prescriptions

Dear Mr. O'Brien,

The Oregon Coalition for Affordable Prescriptions (OCAP) appreciates the opportunity to provide our support for the proposed rules for the Prescription Drug Price Transparency Act (HB 4005, 2018).

OCAP believes that transparency is an essential component of lowering what manufacturers charge for medications and are committed to ensuring HB 4005 is implemented as intended. By requiring drug companies to explain large price hikes, this legislation will create much-needed public accountability for the prescription drug industry to the benefit of Oregon patients and consumers.

We'd like to take this opportunity to emphasize a few key provisions that are in the draft that we see as critical to the intent and effective implementation of HB 4005.

- We encourage DCBS to maintain the current definition of "Net Yearly Increase" which is in-line with the intent of HB 4005 and provides an accurate read of overall price trends.
- We encourage DCBS to maintain a robust review process to determine whether the information reported by manufacturers as trade secret is actually entitled to that protection, and leaves open the possibility of disclosing protected information when it is required for the public interest.
- We encourage DCBS to maintain manufacturer reporting requirements of all patient assistance programs. Including information regarding manufacturer sponsored patient assistance programs *and* independently operated patient assistance programs in reporting requirements is a key element to ensuring true transparency. Removing the later, would incentivize manufacturers to direct funding to these programs to avoid reporting.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink that reads 'Courtney Helstein'. The signature is written in a cursive, flowing style.