October 10, 2025

Oregon Prescription Drug Affordability Board 350 Winter Street NE Salem, OR 97309-0405

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Dear Chair Bailey, Vice Chair Burns, and PDAB Members,

Thank you to the Board for your work on behalf of Oregon patients and the health care system. I also want to welcome Michele Koder and Sarah Young to the Board.

My name is Auden Friedman, and I am a campaign associate with the Oregon State Public Interest Research Group, or OSPIRG. OSPIRG is an advocate for consumers, for their safety, health, and fair treatment. In health care, OSPIRG is an advocate for high value care. Too often consumers pay high prices but don't receive higher quality of care. OSPIRG, through grassroots campaigns and with the help of over 30,000 supporters in Oregon, seeks to cut health care costs which do not pay dividends in quality. OSPIRG is also a member of the Oregon Coalition for Affordable Prescriptions or OCAP, and we share their sentiments today. We support the PDABs continued efforts to fulfill its mission: *to protect Oregonians and our state's health care system from the high costs of prescription drugs.*¹

We need the PDAB now more than ever. As the Oregon health care budget shrinks due to federal policy changes and large premium increases are predicted, we must face the problem of cost.² The health care that we all need to live happy and fulfilling lives is increasingly being priced out of our reach. Prescriptions are a glaring example of this. According to the RAND corporation, we pay 2-3 times as much as other OECD countries for the exact same drugs.⁴ This affects everyone: individuals who pay out-of-pocket for high priced drugs, patients who see their insurance premiums rise, and all taxpayers.

¹ Deb Patterson et al., "Relating to the Price of Prescription Drugs," Pub. L. No. 844 (2022), https://olis.oregonlegislature.gov/liz/2021R1/Downloads/MeasureDocument/SB844/Enrolled.

² https://www.oregon.gov/das/Financial/Documents/Federal-Impact-HR1-Initial-Analysis.pdf ³https://www.kff.org/affordable-care-act/aca-marketplace-premium-payments-would-more-than-double-on-

average-next-year-if-enhanced-premium-tax-credits-expire/

4https://aspe.hhs.gov/sites/default/files/documents/bc582e25376d714694524a492fb15f36/international-pr

^{*}https://aspe.hhs.gov/sites/default/files/documents/bc582e25376d714694524a492fb15f36/international-prescription-drug-price-comparisons.pdf

p.vii. "In brief, when analyzing data for all prescription drugs available in the United States and comparison countries, we found that U.S. prices for drugs in 2018 were 256 percent of those in the 32 OECD comparison countries combined. U.S. prices were even higher than those in comparison countries for brand-name originator drugs (with U.S. prices at 344 percent of those in comparison countries) but were lower, on average, than those in comparison countries for unbranded generic drugs (with U.S. prices at 84 percent of those in comparison countries).

That is why the work of the PDAB is so important. The affordability reviews that the PDAB conducts are important first steps in understanding where there are harmful excess costs in the market. That is valuable information. But even better than information is informed action, like Colorado's PDAB took in setting the first-in-the-nation upper payment limit on Enbrel. The Colorado Consumer Health Initiative estimates that this UPL will save Coloradans \$32 million a year. In Maryland, the PDAB approaches a UPL decision on diabetes drugs Jardiance and Farxiga. To echo county officials who urged the Maryland board to move forward with UPLs, "Drugs don't work if people can't afford them."

Today, the board will make legislative recommendations. We strongly encourage PDAB to empower itself with a tool to fulfill its founding charter: UPL authority. Oregonians are still burdened by the cost of prescription drugs. The PDAB, and particularly its potential UPL authority, is still one of our best hopes for cutting into the glut of unnecessary cost in health care. We ask the board to follow the example set by Colorado in making bold and necessary strides to lower the cost of unjustifiably priced prescriptions.

Thank you for the opportunity to comment on this important issue.

Auden Friedman - OSPIRG

⁵https://marylandmatters.org/2025/09/30/county-leaders-urge-prescription-drug-board-to-set-upper-payme nt-limits/

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