



November 17, 2025

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

TO: Members of Oregon Prescription Drug Affordability Board

As a pediatrician and pediatric rheumatologist who spent my career caring for young people with chronic and disabling conditions, I remain significantly concerned over the Board's antidiabetic drug review. I applaud the Board's efforts obtaining stakeholder input, information, and opinions over Oregonians' drug affordability challenges. However I continue to be troubled as you focus on the drugs' list prices rather than the patients' total drug and health costs. This limited perspective will predictably result in limiting access to essential medications while creating longer term negative health outcomes

Throughout my career, my primary focus is always ensuring the overall well-being of my patients. Given the limited nature of your legislative charges with its focus on implementing Upper Price Limits (UPLs), I fear the Board's analyses and decisions cannot reflect this same mandate.

I was pleased to observe your review of other states' PDAB work during the Board's most recent meetings. The thoughtful presentations and discussions of both the board members' and stakeholders' recommendation to expand the scope to review broader health policies were excellent and spot on. The Board's receptiveness to public input, particularly recommendations to broaden the scope of categories under review and the decision to adopt an extended review timeline, reflects an approach that values careful analysis over expedited decision-making.

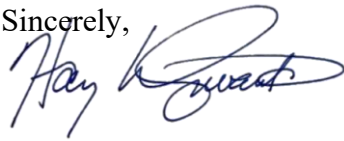
That said, the Board's conversations during its last meeting revealed significant internal divisions regarding its fundamental structure and mission, issues not unique to Oregon. The concerns about Board composition, highlighting that stakeholder feedback suggests the current membership may not reflect the necessary expertise, support for expanding rather than disbanding and highlighting a broadened scope could attract qualified candidates to strengthen the membership are critical and important discussions. The Board also confronts considerable challenges in establishing clear criteria for what constitutes "affordable" medication and defining the parameters of its affordability review process. Greater transparency and detailed clarification of the methodology underlying the drug affordability review process would strengthen stakeholder confidence and ensure consistent application across evaluations. These concerns carry profound implications for the Board's mission, its ability to fulfill it and patient care. When a PDAB lacks clear methodology, sufficient expertise or consensus on its

fundamental purpose, the resulting uncertainty can directly impact patients' ability to access essential medications. A narrow focus on drug list prices, rather than comprehensive patient costs, risks creating artificial barriers that limit access to critical therapies and potentially forcing patients receiving less effective alternatives or creating therapeutic gaps. The Board's internal differences and methodological ambiguities therefore represent more than procedural concerns; they pose tangible risks to patient health outcomes and the credibility of prescription drug affordability efforts statewide.

Everyone shares your goal to lower prescription drug costs, and I applaud how you listen to stakeholders and give thoughtful consideration to the input you receive. I still remain deeply concerned, however, that the current process's narrow focus on drug list prices, rather than the total cost to patients, risks limiting access to essential medications while creating longer-term negative health outcomes rather than achieving the goal of improved access to affordable drugs.

Thank you for your attention to this critical issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "Harry L. Gewanter". The signature is fluid and cursive, with a large, sweeping "H" and "G".

Harry L. Gewanter, MD, FAAP, MACR  
Board Member, Let My Doctors Decide Action Network