

From: Fitzpatrick, Helen <hfitzpatrick@abbvie.com>

Sent: Thursday, February 19, 2026 6:42 AM

To: PDAB * DCBS <pdab@dcbs.oregon.gov>

Subject: AbbVie Comment on Vraylar Affordability Review – Request for Reconsideration

Dear Members of the Oregon Prescription Drug Affordability Board,

Please find attached AbbVie's comment letter regarding the Board's recent affordability determination for VRAYLAR (cariprazine). Our letter outlines significant concerns with both the process and findings of the affordability review, including:

- Lack of clarity and methodological rigor in evaluating affordability, leading to arbitrary and inconsistent outcomes.
- Reliance on incomplete or inaccurate data regarding VRAYLAR utilization, without due consideration for its critical clinical benefits and the unique needs of patients with serious mental illnesses (SMI).
- Insufficient attention to the health economic value of maintaining access and adherence to antipsychotic therapy, which both clinical and economic data demonstrate can improve health outcomes and reduce system costs.
- Mischaracterization of out-of-pocket (OOP) costs due to inaccuracies and an absence of consideration for the impact of insurance benefit design, which plays a greater role than manufacturer pricing.
- Incorrect identification of therapeutic alternatives, which do not reflect clinical practice and fail to account for VRAYLAR's distinct mechanism of action, indications, and safety profile.

Based on these issues, AbbVie respectfully requests the Board to reconsider and reverse its determination that VRAYLAR may pose affordability challenges for Oregon health systems or patients.

Additionally, we strongly urge the Board to prioritize the development and implementation of a transparent and predictable methodology for drug selection, affordability review, and determination before any further reviews are conducted.

We look forward to engaging collaboratively with the Board to advance patient affordability and access to innovative medicines.

Thank you for your attention to these comments and appreciate the Board's response on our reconsideration request. ***Additionally, please confirm receipt of our enclosed comment letter.***

Best,

Helen Kim Fitzpatrick

Vice President, State Government Affairs

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Attachment: AbbVie Comment Letter – VRAYLAR Affordability Review