



February 16, 2026

Oregon Prescription Drug Affordability Board
350 Winter Street NE
Salem, OR 97309-0405
pdab@dcbs.oregon.gov

RE: Oregon Prescription Drug Affordability Board – October 15, 2025, Insulin Product Agenda

Dear Members of Oregon's Prescription Drug Affordability Board:

I am writing on behalf of the Diabetes Patient Advocacy Coalition (DPAC) board, our membership, and families affected by diabetes across Oregon to further convey our previously expressed concern with the mandatory inclusion of insulin products in the board's review of insulin affordability and the inclusion of the basal insulin Lantus in the board's 2025 report to the legislature. By way of background, DPAC is comprised of passionate advocates dedicated to influencing state and federal policies to positively impact the diabetes community. We prioritize affordability, access to care, and health equity as issues that must be addressed to improve diabetes care for all Americans via our advocate voices in Oregon and across America. The organization has worked for over a decade to lower the price of insulin paid for by patients at pharmacy counters by advocating for insulin copay cap laws across the United States.

As previously communicated, we wholeheartedly support the Board's recommendations related to PBM reform and price transparency recommendations put forward by the board and agree that eliminating spread pricing and de-linking PBM fees from drug prices are two steps that would make an immediate impact on the cost of drugs for Oregonians. We believe additional steps are necessary for the state to take to address prescription drug affordability. We also

encourage the Board to also recommend requiring insurers and PBMs to ensure any negotiated savings, whether through rebates, discounts, or other price concessions, are passed directly on to patients at the point of sale in cases where a patient's cost share is based on the price of the drug. This approach can cut the costs to patients in half as rebates for branded drugs average 48%.¹

DPAC is concerned by the inclusion of Lantus, a long-acting basal insulin glargine products, in the PDAB's draft "2025 Drug Review Report for the Oregon Legislature." The draft report does not reflect recent market developments, particularly considering the committee's initial vote on this product, which did not pass, as reflected in the Board's draft minutes from the January 21, 2026 meeting. Over the past several years, patients have experienced meaningful reductions in out-of-pocket insulin costs because of insulin copay caps adopted by governors, state legislatures, Medicaid, and Medicare programs; manufacturer price reductions; and expanded patient assistance programs that help individuals access insulin at low or no cost. DPAC is concerned that these important marketplace realities and the tangible relief they have provided to patients are not acknowledged in the current draft report. Recent data shared with and presented to the board indicate that many insulin glargine products, including Lantus, have experienced measurable reductions in both list prices and patient copayments at Oregon pharmacies between 2018 and 2024. It is also notable that none of the insulin glargine products selected for review by the board, including Lantus, are undergoing pricing reviews by the Center for Medicare and Medicaid Services.

DPAC also respectfully reiterates its concern that the committee considered outdated information as it evaluated patient availability, affordability, and accessibility of insulin glargine products including Lantus. As an example, the board's published findings for this class of insulin product state that list price data shared with the board was from 2018 – 2024. However, Oregon's insulin copay cap, which limited 30-day copayments to \$35 per insulin prescription, did not take full effect until January 2025. As a result, the board's analysis may not fully reflect the most recent policy changes or the real-world reductions in patient out-of-pocket costs that have occurred since that time.

DPAC respectfully encourages the Board to ensure that its report to the Legislature reflects these evolving market dynamics and the real-world patient affordability gains that have already occurred. Given the data limitations and rapidly changing insulin marketplace, we urge the Board to carefully reassess whether its conclusions fully capture the current pricing and access

¹Chandra, A., Flack, E., & Obermeyer, Z. (2021). *The health costs of cost-sharing* (NBER Working Paper No. 28439). National Bureau of Economic Research. <https://www.nber.org/papers/w28439>

reality for Lantus and other insulin glargine products. Patients, policymakers, clinicians, and advocates alike should recognize the meaningful progress that collective efforts have achieved in lowering insulin costs, and it is important that the report acknowledge these advancements, so legislators receive a complete and accurate picture of patient experience today. DPAC appreciates the Board's continued consideration of patient perspectives and stands ready to work collaboratively with Board members and Oregon stakeholders to advance policies that prevent, detect, and treat diabetes while ensuring sustainable and equitable access to care.

Sincerely,

A handwritten signature in black ink, appearing to read "Erin Callahan", with a long horizontal flourish extending to the right.

Erin Callahan
Chief Operating Officer
Diabetes Patient Advocacy Coalition