The Honorable Russell Vought  
Director, The Office of Management and Budget  
Executive Office of the President  
Eisenhower Executive Office Building  
1650 Pennsylvania Avenue, NW  
Washington, DC 20503  

July 23, 2020  

Dear Mr. Vought:  

I am writing on behalf of Allies for Independence, a national nonprofit organization that deals specifically with long term services and supports for individuals with disabilities and those who are aging or have chronic illness. Our organization represents a broad array of individuals including those with a disability, the aging population, individuals with mental health issues, and those who live with chronic disease. Allies for Independence supports the delivery of long term services and supports (LTSS) and their delivery through Medicare, Medicaid, and through home and community-based services (HCBS), through both the public and insurance markets.  

We are writing to you to raise concerns we have if the Administration chooses to implement the International Pricing Model for Medicare Part B Drugs. We believe if this model for drug pricing is applied, innovation related to finding drugs to treat emerging and existing diseases will be muted. As the United States fights the coronavirus pandemic, we must utilize innovation in drug treatments and therapies to find a vaccine or cure for the disease. Stifling the work related to ground-breaking therapies could not only lead to catastrophic consequences for the fight against coronavirus, but it could also negatively affect people with disabilities and those with debilitating chronic illnesses.  

In addition to a slowing of innovation, the International Pricing Model is supported by the quality-adjusted life year (QALY), a tool used to measure the value of health outcomes. The use of the QALY devalues the lives of individuals with disabilities, those who are aging, and those who have chronic illness. If this new model is implemented, it could create significant barriers for the individuals we serve to access needed medications.  

While we do believe that the issue of drug pricing is important, we do not believe that the U.S. should be considering changes in the way high-risk individuals receive and pay for life-saving medications during a healthcare pandemic. There continue to be other innovative ways to look at the issue of drug pricing that doesn’t hinder those most in need of treatment.  

Sincerely,  

Connie Garner  
Executive Director, Allies for Independence