



November 18, 2015

The Honorable Sylvia Burwell
U.S. Department of Health and Human Services (HHS)
200 Independence Ave SW
Washington, DC 20201

Dear Madam Secretary:

On behalf of the Campaign for Personal Prescription Importation (CPPI), we thank you for convening the HHS Pharmaceutical Forum on innovation, access, affordability, and better health.

We appreciate the significant costs associated with specialty drugs that treat life-threatening diseases; however, we are disappointed that your forum seemingly will not address chronic disease management and the associated prescription drug costs. If, in fact, your purpose is to “foster a health care system that ... delivers the most affordable, highest quality medicines and results in healthier people,” then basic health maintenance medication costs must be addressed.

We are writing you today to include some specific information on the topic of health maintenance medications and at least one approach to ease the high cost of medications that millions of Americans face in managing a wide variety of chronic conditions.

Seniors, retirees, and those living on fixed-incomes or low-income individuals are the most at risk in not being able to afford their much-needed prescription medications. This is even more critical when you consider that “people with lower assets and income tend to be in worse health,” according to the author of an Employee Benefit Research Institute study.¹ The Mayo Clinic found in a 2013 that “nearly 70 percent of Americans take at least one prescription drug, and more than half take two.”² The study further notes as individuals advance in age, the number of medications taken also increases.

The Kaiser Foundation Health Tracking poll found the American public in large numbers and across the political spectrum wants action from the government to control prices: 74% of Democrats, 60% of Independents, and 56% of Republicans.³ Kaiser data from an August poll indicate that a majority of Americans (54%) currently take a prescription medication and 72% think drug costs are unreasonable when compared to other developed countries. That same percentage favors allowing individuals to import their medications from Canada – with 74% believing importation to be an effective cost management strategy.⁴

Thus, it is critical to shore up the prescription drug safety net to ensure those most in need have affordable and safe access to the necessary life-saving medications maintaining their health. Medicare Part D has been helpful, but it is no panacea. Anecdotally, we know the Affordable Care Act seeks to curb costs of medicines for all Americans, particularly for those who fall into

¹ http://www.ebri.org/pdf/notespdf/EBRI_Notes_04_Apr15_EoL-PolFor.pdf

² <http://newsnetwork.mayoclinic.org/discussion/nearly-7-in-10-americans-take-prescription-drugs-mayo-clinic-olmsted-medical-center-find/>

³ <http://kff.org/health-costs/poll-finding/kaiser-health-tracking-poll-october-2015/>

⁴ <http://kff.org/health-costs/poll-finding/kaiser-health-tracking-poll-august-2015/>

the so-called “donut hole” of Medicare Part D. The jury is still out on whether this can and will be accomplished. In the interim, prices for all manner of medications have risen significantly (by 15 percent in the last year alone). We are worried this is the continuance of a long trend upward in the cost of medications. There are a number of steps that you and the President can and should take to help alleviate this situation.

We know factually that for over a decade at least a million Americans annually have found safe, affordable brand-name prescription medications from licensed, legitimate sources in Canada – and at significant savings⁵ and with a perfect health safety record.

We know, too, bad actors exist and we are working with our partners in Canada to eradicate these so-called rogue online pharmacies. It is one reason we support bipartisan legislation that has been introduced annually in Congress to address how Americans can safely import basic health maintenance medications from Canadian pharmacies. Each iteration of importation bills over the years has varied slightly, but all have focused on safety of the American people by creating a white list of approved Canadian pharmacies. This is critical given the existence of rogue elements and the large number of Americans who are turning to online sources to import their medications because of cost.⁶

Legislation⁷ before Congress currently calls for the following critical elements:

- Establishing a program for American consumers to safely import prescription drugs from Canada;
- Allowing American patients to purchase, with a valid prescription from a U.S. physician, a 90-day supply of prescription drugs;
- Requiring drugs from Canada be dispensed by a licensed pharmacist;
- Drugs available for purchase must have the same active ingredient(s), route of administration, and dosage form and strength as an FDA-approved drug; and
- Does not allow to be imported certain types of drugs including controlled substances.

Passing meaningful, effective legislation that allows Americans to safely import from licensed, legitimate pharmacies in Canada those health maintenance medications made in the same factories with the same active ingredients as those manufactured for the American market is one solution many Americans support. And we can do this without any negative impact to Americans' health.

Sen. Bernie Sanders (I-VT) has noted^{8,9} that Americans who purchase medications such as Advair® (asthma); Crestor® (high cholesterol); Nexium® (heartburn); Januvia® (type-II diabetes); or Celebrex® (arthritis) from licensed, legitimate Canadian pharmacies are realizing savings of 67% or more. In terms of dollar values, that means hundreds or thousands of dollars in reduced costs for a single 90-day supply of medication. That extra money is vital to the health and well-being of our seniors and other low- and fixed-income Americans.

⁵ <http://www.cipa.com/news/cipa-survey-of-americans-finds-64-purchase-medications-from-canada-due-to-affordability/>

⁶ Cohen RA, Kirzinger WK, Gindi RM, “Strategies used by adults to reduce their prescription drug costs,” NCHS data brief, no 119. April 2013. Hyattsville, MD: National Center for Health Statistics. 2013. NCHS data shows that approximately 2% of the adult U.S. population imports prescription medication for personal use on an annual basis.

⁷ 114th Congress: Safe and Affordable Drugs from Canada Act (S. 122/H.R. 2228); Prescription Drug Affordability Act (S. 2023/H.R. 3513)

⁸ Senator Sanders (VT). “Pharmaceutical Industry and Cost of Prescription Drugs.” Congressional Record 162:142 (September 29, 2015) p. S6997

⁹ Senator Sanders (VT) question period, U.S. Senate Committee on Health, Education, Labor and Pensions [hearing on the Nomination of Dr. Robert Califf to serve as FDA Commissioner](#), November 17, 2015

“The central issue is fairness for millions of Americans struggling to afford the soaring costs of prescription drugs.” We wholeheartedly agree with the late Senator Edward Kennedy, a vehement supporter of importation of basic health maintenance drugs from safe, reliable, licensed, and affordable sources in Canada.

We thank you for considering this information and stand ready to work with you and other stakeholders to help implement meaningful changes.

Sincerely,

A handwritten signature in blue ink, appearing to read "BRYAN TACKETT", with a stylized flourish at the end.

Bryan Tackett
Executive Director
Campaign for Personal Prescription Importation