



**Comments of the Trade Alliance to Promote Prosperity in Response to the Centers for Medicare & Medicaid Services' Proposed Rule Changes**

Dear Centers for Medicare & Medicaid Services Staff:

On behalf of the Trade Alliance to Promote Prosperity (TAPP), I am submitting these comments in response to a rule proposed by the Centers for Medicare & Medicaid Services (CMS). Particularly, TAPP writes to express our concern with the proposed price verification surveys for certain prescription drugs.

TAPP is a coalition of American companies, workers, trade associations, opinion leaders, lawmakers, and policymakers committed to building America's economy by creating jobs through strategic trade partnerships that will drive growth for decades to come.

TAPP urges you to reject the proposed rule on price verification. It is a blatant attempt at government overreach and would do little to address actual healthcare issues. Instead, it would add unnecessary hurdles and impose burdensome costs on life science companies that provide lifesaving cures to Americans and the international community.

The proposed annual surveys would actually function as audits of the prescription drug manufacturers. The federal government would have carte blanche to delve into the finances and spending of private American companies. The only way to avoid this audit is to agree to price negotiations with the federal government.

The CMS is clear: Either comply with our rules or face severe monetary and regulatory consequences.

Government mandates on life science companies would hinder their ability to create new medicines. This would result in fewer cures for patients, fewer choices for doctors, and fewer dollars invested into the American economy.

Life science companies are beacons of American innovation. Government policies should prioritize medical advancement and bolster manufacturers' ability to create new medicines. The proposed rule would severely restrict the ability of medical innovators to create the medicines that Americans have become accustomed to having available.

Government agencies should promote American innovation and innovators. Constraining medical innovators is bad for American patients, doctors, and the economy. Please reject the proposed rule on price verification surveys.

Sincerely,

Kent Kaiser, Ph.D. executive director  
Trade Alliance to Promote Prosperity