July 21, 2026

The Honorable James Comer
Chairman
Committee on Oversight and Government Reform
U.S. House of Representatives
Washington, D.C. 20515

The Honorable Robert Garcia
Ranking Member
Committee on Oversight and Government Reform
U.S. House of Representatives
Washington, D.C. 20515

Re: Statement for the Record in Support of H.R. 6610

Dear Chairman Comer and Ranking Member Garcia:

The Oversight Committee has been a source of bipartisan leadership on PBM reform. The Committee's prior work in advancing the DRUG Act (Delinking Revenue from Unfair Gouging Act) through markup during the last Congress demonstrated a serious and deliberate commitment to addressing PBM abuses affecting federal employees.

H.R. 6610 represents a continuation of that work and reflects the Committee's understanding of the structural misalignments in pharmacy benefit management that can harm patients, plan sponsors, and pharmacies. Transparency Rising applauds the Committee's persistence in pursuing reform on behalf of the federal workforce.

Transparency Rising appreciates the Committee's consideration of H.R. 6610, the Pharmacists Fight Back in Federal Employee Health Benefit Plans Act and submits this statement in support of its objectives.

The legislation addresses unfair practices and reimbursement strategies used by some PBMs; particularly vertically integrated models that can profit from directing prescriptions to affiliated retail, mail-order, or specialty pharmacies, that can reduce patient choice, distort pharmacy competition, and weaken the value of the benefit for federal employees. Our support reflects the perspective of transparent, pass-through PBMs and aligned companies, many of whom are led by pharmacists themselves, seeking to align compensation with plan sponsors and patients, preserve meaningful pharmacy choice, and allow materially different PBM models to compete.

Federal employees and community pharmacists are important constituencies and valued partners of Transparency Rising's member companies. Transparency Rising speaks from the perspective of transparent, pass-through PBMs and aligned market participants, not on behalf of pharmacists, but our interests often converge. Our members pass through all rebates and discounts to the plan, seek to align compensation with plan-sponsor and patient interests, and regard community pharmacists as essential partners in patient care and meaningful pharmacy choice. That model gives us a distinct interest in reforms that limit conflicted steering and allow unaffiliated pharmacies and transparent PBMs to compete on the merits.

In the interest of full candor, Transparency Rising's member companies overwhelmingly do not currently contract with or serve FEHBP plans or federal employees. Accordingly, the direct effects of this bill will not primarily flow through transparent, pass-through PBMs. Rather than diminishing our support, that fact underscores the opportunity H.R. 6610 presents: address the fact that the FEHBP and other government pharmacy-benefit markets remain acutely and heavily concentrated among a small number of vertically integrated PBMs.

H.R. 6610 is an important step toward protecting choice and improving those market conditions. Its full promise will be realized when federal procurement and contracting practices also permit transparent, patient-aligned PBM models to compete on true net cost, service, and measurable performance.

Through under-scrutinized procurement processes and substantial taxpayer underwriting, vertically integrated PBMs and insurers have been enabled to scale artificially - often at the expense of local pharmacies, data transparency, and patient access, with particularly significant impacts on rural and hard-to-reach communities.

Transparency Rising supports H.R. 6610 and appreciates the Committee's continued attention to PBM practices affecting federal employees and the broader federal market. We encourage the Committee, as it continues this work, to preserve the bill's protections against conflicted steering and to consider complementary review of federal PBM contracts and procurement practices. Transparency Rising encourages the Committee to consider how existing federal PBM contracts implement reporting obligations such as those reflected in newer delinking, disclosure, reimbursement, and compliance requirements: including whether they are incorporated across federal PBM arrangements, applied to affiliates and intermediaries, supported by usable data and audit rights, and carried out in practice. Thoughtful and consistent contract review could do more than assess compliance; it could also help identify terms that wrongfully preserve incumbent advantages and generate a fairer pathway for qualified competitors to enter federal markets.

Together, these efforts can protect federal employees, strengthen accountability, reduce structural barriers to entry, and open government markets to transparent competition.

We thank Chairman Comer, Ranking Member Garcia, and the members of the Committee for the opportunity to submit this statement, and we stand ready to serve as a resource as the Committee continues this important work.

Respectfully submitted,

Joseph M. Shields, Esq.
Chief Executive Officer
Transparency Rising