



National Health Council

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Intellectual Property Enforcement Coordinator
Office of Management and Budget
Executive Office of the President

On behalf of the more than 133 million people in this country with chronic diseases and disabilities and their family caregivers, the National Health Council thanks you for the opportunity to comment on your Joint Strategic Plan against intellectual property infringement.

We appreciate the Office of Management and Budget's leadership on this important endeavor.

The core membership of the NHC is made up of 50 patient advocacy groups. The patients these organizations serve are dependent on modern drug therapies to battle the harmful effects of their conditions. A number of patient groups have numerous treatment options available (e.g., multiple sclerosis, arthritis, psoriasis). For these patients, lack of affordability and access to these therapeutics remains a large concern. In other disease and disability areas (e.g., lupus, ALS), patients are still waiting for effective treatments and cures.

Accordingly, we remain attentive to matters of improved access to existing drug therapies, but also remain concerned about creating the proper incentives that lead to the advancement of new treatments and cures. As such, a strong intellectual property strategy is needed to balance these important – yet often competing – interests.

The affordable access to prescription drugs means very little if the safety and authenticity of medications cannot be guaranteed. The NHC thanks you for addressing the need to secure the supply chains to minimize the threat posed by IP infringing products in Supplemental Topic 13. Ensuring the integrity of these chains is of utmost importance to the safety of patients who use these products. Should these chains be compromised, patients have no guarantee that the products that they use are safe. We thank you for further addressing the threat to public health and safety caused by these counterfeit products in Topic 17. Proper enforcement of intellectual property law is vital to keeping counterfeit and adulterated drugs and biologics off the market and ensuring that products used in the United States are authentic and safe.

We support your investigation of these two topics that are important to the safety and well-being of patients with chronic conditions. We look forward to working with you on developing intellectual property policies that will improve access to safe, affordable therapies while fostering the development of new and better treatments and cures.

Sincerely,

Myrl Weinberg, CAE
President