

Congress of the United States
Washington, DC 20515

March 5, 2026

The Honorable Robert F. Kennedy, Jr.
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Dear Secretary Kennedy:

On December 19, 2025, the Trump Administration released two proposed models from the Centers for Medicare & Medicaid Services (CMS) Innovation Center (CMMI) purporting to bring drug prices in Medicare down to international levels. The Global Benchmark for Efficient Drug Pricing (GLOBE) Model would require manufacturers to pay rebates to the federal government when drug prices in Medicare Part B exceed an international pricing benchmark. The Guarding U.S. Medicare Against Rising Drug Costs (GUARD) Model takes a similar approach with respect to drugs under Medicare Part D. The GLOBE Model would apply to drugs that are among the top 50 highest spending drugs in Part B with over \$100 million in annual Medicare fee-for-service spending. The GUARD Model would apply to drugs with over \$69 million in gross drug costs in Part D, indexed to inflation.

We strongly agree that the United States is paying too much for prescription drugs relative to other countries. The GLOBE and GUARD Models, however, appear to be yet another attempt to dupe the American people into believing the Trump Administration is doing something to lower their drug costs. While the Trump Administration is claiming participation in GLOBE and GUARD is “mandatory,” pharmaceutical companies that have reached drug pricing agreements with the White House are openly telling the press and their shareholders that they are exempt from GLOBE and GUARD. In other words, manufacturers may be able to get out of providing international level drug prices in Medicare by agreeing to separate drug pricing deals with the White House, which likely do nothing to meaningfully lower drug prices for the American people. There is virtually no publicly available information to back up the Trump Administration’s claims that its Oval Office announcements with pharmaceutical companies will lower drug prices, and pharmaceutical company stocks have actually risen in the aftermath of these announcements.

To date, 16 pharmaceutical companies have reached drug pricing agreements with the Administration, meaning they are likely exempt from the GLOBE and GUARD Models.¹ There are potentially more company announcements on the way. Because GLOBE and GUARD only apply to drugs that meet minimum Medicare spending thresholds, it is unclear how many drugs

¹ The following manufacturers have entered into agreements with the Trump Administration: Pfizer, AstraZeneca, EMD Serono, Eli Lilly, Novo Nordisk, Amgen, Boehringer Ingelheim, Bristol Myers Squibb, Gilead, GlaxoSmithKline, Merck, Novartis, Sanofi, Genentech, Johnson & Johnson, and AbbVie.

would even be subject to GLOBE and GUARD. It is possible these Models will ultimately not apply to any drugs at all.

The Department of Health and Human Services (HHS) once again is not living up to the “radical transparency” that was repeatedly promised throughout Robert F. Kennedy Jr.’s confirmation process. In order to provide a clearer picture about the extent to which GLOBE and GUARD will lower drug prices in Medicare, as well as ensure Congress understands the breadth of these agreements, we request HHS promptly provide the following information and commitments:

1. Provide an analysis to Congress of which drugs are likely to qualify for the first year of participation in the GLOBE and GUARD Models if the 16 manufacturers that have entered into agreements with the Trump Administration are exempt from participation.
2. Make available to Congress the drug pricing agreements entered into between the 16 manufacturers and HHS, the White House, or other parts of the Trump Administration—including without redaction of any language or terms that could result in manufacturer exemptions from the GLOBE and GUARD Models. If these agreements are truly going to deliver lower drug prices for the American people, there should be no reason to continue to keep them hidden from the public.
3. On December 30, 2025, the Trump Administration updated the request for applications for the Generating Cost Reductions for U.S. Medicaid (GENEROUS) Model to include language that appears to give CMS the ability to waive GLOBE and GUARD Model participation or requirements for manufacturers that participate in GENEROUS.² The GENEROUS Model notes that these waivers will be codified in Model participation agreements between CMS and manufacturers. We therefore request that HHS commit to making these participation agreements available to Congress, including without redaction of any language or terms that could result in manufacturer exemptions from the GLOBE and GUARD Models.

² The GENEROUS Model is intended to ensure that manufacturers offer international level pricing to state Medicaid programs. Members of Congress and experts have previously pointed out that the GENEROUS Model is unlikely to result in meaningful savings for states, since Medicaid already has access to low drug prices that often reflect or are even lower than international pricing.

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Please provide the information and materials requested above no later than March 19, 2026. We appreciate your responsiveness to this request.

Sincerely,



Ron Wyden
Ranking Member
Senate Committee on Finance



Frank Pallone, Jr.
Ranking Member
House Committee on Energy and Commerce



Richard E. Neal
Ranking Member
House Committee on Ways and Means

cc: The Honorable Mehmet Oz
Administrator
Centers for Medicare & Medicaid Services