



COALITION AGAINST **SOCIALIZED MEDICINE**

a Project of **THE CONSERVATIVE POLITICAL ACTION COALITION**

**To: Hon. Dr. Mehmet Oz, Administrator, Center for Medicare & Medicaid Services
Hon. Abe Sutton, Administrator, Center for Medicare & Medicaid Innovation**

From: Andrew Langer, Executive Director, Coalition Against Socialized Medicine

Date: February 23, 2026

Re: Comments on CMS's Notice of Proposed "Global Benchmark for Efficient Drug Pricing (GLOBE)" Model, Docket #CMS-2025-1889, Published December 23, 2025

Introduction

Below are comments of the Coalition Against Socialized Medicine (hereafter "CASM") to the Center for Medicare & Medicaid Services (CMS), of the Department of Health and Human Services (HHS), in response to the GLOBE model notice, Docket #CMS-2025-1888-0001, published in the Federal Register on December 23, 2025.

CASM is a coalition of allied free-market, limited-government policy research, education and advocacy organizations, and is led by the Conservative Political Action Coalition (CPAC), a non-profit, non-partisan 501(c)(4) research, education and advocacy organization based in Alexandria, Virginia.

Our coalition is dedicated to defending the free-market principles that uphold America's healthcare system. This includes strong opposition to any form of government overreach into the health market and rejection of efforts to implement single-payer healthcare models, price controls—foreign or domestic—or to eliminate private insurance. Our coalition urges policymakers to instead advance policies that foster innovation, protect intellectual property, and increase competition. CASM promotes free-market-driven solutions that aim to increase accessibility of care, expand the supply of healthcare professionals, and provide effective outcomes for patients and taxpayers alike. Ultimately, CASM seeks to protect domestic competition and R&D in our healthcare system while opposing the threats of socialized medicine in all its forms.

GLOBE Will Hurt American Healthcare

The proposed CMS model, Global Benchmark for Efficient Drug Pricing (GLOBE), works against America's free market system, which promotes innovation and prosperity. The administration should swiftly withdraw this proposal, which would implement Most Favored Nation (MFN) pricing policy into

Medicare Part B (used to cover infusions and injections). MFN policies tie American drug prices to foreign nations with socialized medicine, effectively embracing their single-payer systems and price controls here at home. GLOBE will impose this disastrous policy, which will bring with it all the failures of socialist healthcare systems into Medicare.

Worse yet, the model will be implemented into Medicare through a failed Obama-era program, the Center for Medicare and Medicaid Innovation (CMMI). Despite the fact that it was originally designed to find ways to lower costs, a [2023 Congressional Budget Office \(CBO\) study](#) found that CMMI cost American taxpayers \$5.4 billion between 2011 and 2020. This is particularly jarring considering it was projected to *save* \$2.8 billion in that period. The report also projects CMMI will increase net federal spending by \$1.3 billion by 2030. Continued deployment of any CMMI models is a massive waste of time and taxpayer dollars. Implementing GLOBE through this program will be devastating for American innovation, competition, and patients' quality of care.

Price controls of any kind, whether imposed domestically or imported from abroad, undermine research and development. By placing price caps on prices, and therefore revenues of medicines, this model strip away incentives that drive innovation. Domestic pharmaceutical manufacturers will be unable to invest the [millions of dollars](#) and [years](#) of research required to develop new treatments if their ability to recoup return on this investment becomes limited. This will open the door for foreign adversaries like communist China to take over the market and solidify its spot as global leader in the biopharmaceutical space while leaving American taxpayers to suffer. Reduced innovation will also erode patient care by delaying access to necessary treatments and limiting options for patients.

Conclusion

While the intent of MFN is to curb foreign freeloading and lower prices, importing socialized medicine (the worst healthcare system in the world) is not the solution. America has long been the leader in pharmaceutical manufacturing and innovation. GLOBE will put that leadership at risk.

CASM urges the administration to rescind and withdraw this proposal to put patients, taxpayers, and American manufacturing first. Allowing GLOBE to move forward would undermine domestic research and development while opening the door to socialist price controls in our health care system.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Andrew M. Langer". The signature is written in a cursive, flowing style.

Andrew M. Langer
Executive Director
Coalition Against Socialized Medicine



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From: Andrew Langer, Executive Director, Coalition Against Socialized Medicine

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Re: Comments on CMS's Notice of Proposed "Guarding U.S. Medicare Against Rising Drug Costs (GUARD)" Model, Docket #CMS-2025-1889-0001, Published December 23, 2025

Introduction

Below are comments of the Coalition Against Socialized Medicine (hereafter "CASM") to the Center for Medicare & Medicaid Services (CMS), of the Department of Health and Human Services (HHS), in response to the GUARD model notice, Docket #CMS-2025-1888, published in the Federal Register on December 23, 2025.

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GUARD Will Hurt American Healthcare

The proposed CMS model, Guarding U.S. Medicare Against Rising Drug Costs (GUARD), works against America's free market system, which promotes innovation and prosperity. The administration should swiftly withdraw this proposal, which would implement Most Favored Nation (MFN) pricing policy into

Medicare Part D (used to cover pills and tablets). MFN policies tie American drug prices to foreign nations with socialized medicine, effectively embracing their single-payer systems and price controls here at home. GUARD will impose this disastrous policy, which will bring with it all the failures of socialist healthcare systems into Medicare.

Worse yet, the model will be implemented into Medicare through a failed Obama-era program, the Center for Medicare and Medicaid Innovation (CMMI). Despite the fact that it was originally designed to find ways to lower costs, a [2023 Congressional Budget Office \(CBO\) study](#) found that CMMI cost American taxpayers \$5.4 billion between 2011 and 2020. This is particularly jarring considering it was projected to *save* \$2.8 billion in that period. The report also projects CMMI will increase net federal spending by \$1.3 billion by 2030. Continued deployment of any CMMI models is a massive waste of time and taxpayer dollars. Implementing GUARD through this program will be devastating for American innovation, competition, and patients' quality of care.

Price controls of any kind, whether imposed domestically or imported from abroad, undermine research and development. By placing price caps on prices, and therefore revenues of medicines, this model strips away incentives that drive innovation. Domestic pharmaceutical manufacturers will be unable to invest the [millions of dollars](#) and [years](#) of research required to develop new treatments if their ability to recoup return on this investment becomes limited. This will open the door for foreign adversaries like communist China to take over the market and solidify its spot as global leader in the biopharmaceutical space while leaving American taxpayers to suffer. Reduced innovation will also erode patient care by delaying access to necessary treatments and limiting options for patients.

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