

February 23, 2026

The Honorable Dr. Mehmet Oz, Administrator of the Centers for Medicare & Medicaid services
The Honorable Abe Sutton, Director of the Center for Medicare and Medicaid Innovation
The Center for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244

Re: Request for Comments on the Guarding U.S. Medicare Against Rising Drug Costs (GUARD) Model
Docket ID: CMS-5546-P

Submitted by: American Commitment

Dear Dr. Oz and Mr. Sutton:

American Commitment respectfully submits the following comments in reference to the [Guarding U.S. Medicare Against Rising Drug Costs](#) (GUARD) model. For the reasons outlined below, we urge the Center for Medicare and Medicaid Services (CMS) to withdraw this model in its entirety.

As healthcare affordability continues to impact millions of Americans, we support policies that genuinely expand patient choice, promote competition, and improve access to care – proven tools for driving costs down. However, the use of the Center for Medicare and Medicaid Innovation (CMMI) to unilaterally launch the GUARD model is an inappropriate response to address soaring drug costs.

GUARD would effectively impose most-favored-nation (MFN) pricing in American healthcare, which imports flawed foreign price controls by tying U.S. drug prices to international price ceilings. Implementing such policies through mandatory demonstration models – that bypass congressional approval and override critical provider input – shifts decisions about drug availability, coverage, and utilization away from patients and physicians and toward federal price-setting formulas.

In doing so, this model further entrenches bureaucratic overreach within the healthcare system by expanding federal authority over patient access and treatment decisions, silencing the voices that should matter the most. This growing bureaucracy threatens care quality by limiting access to medicines, distorting market incentives, and undermining medical innovation.

Beyond these procedural and structural concerns, MFN policies also import the centralized healthcare frameworks of foreign governments that deprioritize patient choice and competitive markets – an approach fundamentally at odds with the principles of liberty and freedom on which the United States was founded. Embedding socialized medicine through GUARD increases the risk of importing the longer wait times, restricted access to care, and diminished incentives to invest in the development of future

lifesaving treatments, all of which are features of nations with government-run care, and ultimately leaving patients and providers worse off.

Affordability reforms that rely on federal price-setting risks repeating the failures that have constrained healthcare access and innovation abroad. Therefore, we urge CMS to reject flawed MFN policies and withdraw the proposed GUARD model. GUARD represents bureaucratic overreach that impedes individual liberty and is not a meaningful solution to rising healthcare costs.

Thank you for your time and consideration.

Sincerely,

Jon Decker
Executive Director
American Commitment