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Federal Trade Commission
Office of the Secretary
Room H-113 (Annex X)
600 Pennsylvania Avenue, N.W.
Washington, D.C. 20580

Re: Health Care Workshop, Project No. P131-1207 submission of comments on behalf of Allergy & Asthma Network

The Allergy & Asthma Network (AAN) appreciates the opportunity to provide supplemental comments to the Federal Trade Commission (FTC) notice and questions regarding "Examining Health Care Competition." 79 Fed. Reg. 10153 (2014).

AAN offers the following comments and insight to the FTC as it seeks to better understand the competitive dynamics of evolving health care product and service markets, in particular innovative care models in the allergy and asthma marketplace.

AAN is the leading nonprofit family health organization whose mission is to eliminate unnecessary suffering and death due to asthma, allergies and related conditions through three core mission areas: education, advocacy and outreach. AAN provides medically reviewed publications, *Allergy & Asthma Today* magazine and the E-newsletter that reach more than 5,000,000 readers per year. These are practical patient, caregiver and consumer lifeline resources to medical news, current health care regulatory developments and healthy living. Our work is always patient-centered, and we never endorse products or services.

Within our advocacy mission area our goals remain patient-centric. AAN has a history of success implementing practical, family-friendly change. Our annual Allergy & Asthma Day Capitol Hill highlights critical issues that need national attention. For example, the School Access to Emergency Epinephrine Act, signed into law on November 13, 2013, provides incentives to states with laws to provide stock epinephrine and trained staff members to more readily respond to life-threatening allergic reactions. In addition, we led the campaign to ensure students' rights to carry and self-administer their lifesaving asthma and anaphylaxis medications at school. As a result, all 50 states and the District of Columbia subsequently passed laws addressing the issue. Other issues include educating patients, law enforcement and medical professionals about the ongoing and pervasive deception in allergy care, the change from CFC to HFA inhalers, reducing government waste and protecting patients by halting CMS reimbursement for illegally manufactured nebulizer medications.



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Within our outreach mission area, we broaden our patient-centered network of health care stakeholders by training and deploying Anaphylaxis Community Expert (ACE) teams comprised of allergists, nurses and lay volunteers from 45 states around the country to offer free awareness and training programs for schools, parents, caregivers and community groups and to work in their local neighborhoods to serve community needs. The ACE teams also distribute best practices, evidence-based guidelines and resources in asthma and allergy care to primary care providers in their states and serve as advocates for legislative change at local, state and national levels. Our Hispanic Outreach Program includes culturally competent Spanish-language materials and a volunteer network that works directly with underserved families.

We applaud the FTC and appreciate its engagement in this important area of allergy and asthma care and the thoughtful approach in which the FTC is soliciting views from stakeholders on these issues. We encourage you to use AAN as a resource for the patient population in allergy and asthma. We look forward to continuing to work with you and other stakeholders, as you continue consideration of these and other important matters to advance competition and consumer choice.

Sincerely,

Tonya Winders
President & CEO