

## Oregon Department of Consumer and Business Services Division of Financial Regulation, Bulletin No. DFR 2026-2

To: All manufacturers of prescription drugs subject to Oregon Drug Price Transparency Program

Date: February 13, 2026

RE: Withdrawal of Bulletin DFR 2024-3

### I. Purpose:

This bulletin withdraws Bulletin DFR 2024-3 re: Suspension of requirement to file certain annual price increase reports.

### II. Authority:

- ORS 646A.689
- *Pharm. Research & Manufacturers of Am. v. Stolfi*, 153 F4th 795 (9th Cir 2025)

### III. Guidance:

Bulletin DFR 2024-3 provided guidance to prescription drug manufacturers subject to the Oregon Drug Price Transparency Program regarding a 2024 U.S. District Court ruling that resulted in the indefinite suspension of the program's annual price increase reporting. Subsequently, the Ninth Circuit Court of Appeals issued a ruling effective October 31, 2025 overturning that decision. Accordingly, the department must resume collection of mandatory price increase reports from manufacturers and Bulletin DFR 2024-3 is hereby withdrawn.

This bulletin is effective upon issuance.



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TK Keen, Administrator  
Insurance Commissioner  
Division of Financial Regulation

2/13/2026

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Date