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The Honorable Sherry Glied
Assistant Secretary for Planning and Evaluation
Department of Health and Human Services
Hubert H. Humphrey Building
Room 447-D
200 Independence Avenue, SW
Washington, DC 20201

Attention: CER Inventory

Dear Assistant Secretary Glied:

On behalf of the more than 200 members of DMAA: The Care Continuum Alliance, I respectfully offer the following comments for your consideration in response to the Request for Information on the Development of an Inventory of Comparative Effectiveness Research issued July 19, 2010, in the *Federal Register*.

DMAA: The Care Continuum Alliance represents organizations providing services along the continuum of care to more than 160 million Americans through wellness, chronic care management and complex case management. DMAA: The Care Continuum Alliance members include wellness, disease management and population health management (PHM) organizations; health plans; labor unions; employer organizations; pharmaceutical manufacturers; pharmacy benefit managers; health information technology innovators and device manufacturers; physician groups; hospitals and hospital systems; academicians; and others. These diverse organizations share DMAA: The Care Continuum Alliance's vision of aligning all stakeholders toward improving the health of populations. Our members seek to improve health care quality and contain health care costs by providing targeted interventions and services to individuals who are well, at-risk or managing one or more chronic conditions.

Comparative Effectiveness Research (CER) is an area that is of great interest to DMAA: The Care Continuum Alliance and its stakeholders. We recognize the importance as well as the short and long term benefits of a comprehensive inventory of both published and non-published studies that can inform health care providers and consumers of the effectiveness of various interventions.

We believe that the body of CER evidence should include both methodological considerations as well as intervention-related research due to the need to accurately

compare and consolidate individual studies which would be difficult without evidence-based evaluation standards proven acceptable for real world research.

We also believe that much of the CER research should be done using the consolidation of data from a variety of sources so that accurate population representation can be achieved at all levels of analysis.

With this in mind, DMAA: The Care Continuum Alliance, in collaboration with RAND, is currently in the developmental stages of a comprehensive industry wide data repository that could be used to respond to both methodological and programmatic questions that will inform the CER inventory for all healthcare players.

The repository will include data from all population health management stakeholders including health plans, program providers, health and provider systems, etc. Data included in the repository will extend well beyond claims data, which is the focus of the majority of current industry databases, to include self reported and intervention level information. With our partner, RAND, the first year research agenda will include research focused on understanding the impact of evaluation approaches on intervention outcomes as well as understanding the relative impact of various wellness focused interventions.

A repository such as the one described above will not only inform the CER landscape but could also drive the research agenda once gaps in CER have been identified and specific needs have been developed. In addition, the opportunities for research from a comprehensive data repository that is truly representative of an industry could be very successful in helping providers and consumers make more informed and accurate care decisions.

We fully support additional research to identify research gaps in approaches to health care that supports individuals and health providers. We look forward to working with the Department on this important undertaking and would be pleased to provide greater detail around our broader research agenda.

Sincerely,

Jeanette May, PhD, MPH
Vice President, Research & Quality