

HHS DRAFT Strategic Plan FY 2018 – 2022

AcademyHealth Comments Submitted 10.26.17

AcademyHealth was pleased to have an opportunity to comment on the U.S. Department of Health and Human Services (HHS) draft strategic plan. In keeping with the format and structure of the request for information (RFI), our comments were uploaded separately in response to each section of the plan – by goal, and where necessary, objective. Due to the short window for responses, our comments were limited to priorities previously endorsed and approved by our Committee on Advocacy and Public Policy and Board of Directors, with the final submission approved by the respective chairs of each. As such, these comments focus primarily on the need to continue to support a robust health services research infrastructure by ensuring adequate funding, training, access and sharing of data, and the creation and sustenance of policies that promote, and do not unnecessarily restrict, the conduct, translation and dissemination of research.

The text of our responses is below.

Strategic Goal 1: Reform, Strengthen, and Modernize the Nation’s Health Care

AcademyHealth appreciates the opportunity to provide input to the U.S. Department of Health and Human Services (HHS) on the strategic goals, associated objectives and strategies presented in the draft HHS Strategic Plan, FY 2018 – 2022. We are the nonpartisan, professional home for more than 4,000 health services researchers, policy analysts, practitioners, and organizations whose work helps us understand and improve care for individuals, strengthen the performance of the health system, and enable better health outcomes for more people, at greater value.

We agree with the agencies listed as working to achieve this goal, and in particular the important role of the Agency for Healthcare Research and Quality in developing the evidence base for action and measurable progress. In addition, the National Institutes of Health, through their investments in health services research and implementation research, also support this goal.

Across the areas of focus under this goal, rigorous and timely evaluation studies will be crucial for helping HHS and other decision makers understand the impact of the strategies they test and then refine these strategies moving forward. AcademyHealth encourages HHS to consider the recommendations of the Commission on Evidence Based Policymaking and continue to establish, improve, and promote open data policies that encourage and do not restrict access to and sharing of data in structured machine-readable formats, in timely and appropriate ways, so that it may be used by researchers, innovators, and others to generate actionable evidence and to inform policymakers and others on progress toward this objective. We also encourage HHS to establish and promote policies that encourage appropriate processes for ensuring robust evaluations and do not restrict access to the results of evaluations so that all decision makers -- in the public and private sectors -- have





access to the information they need to make the best choices to improve health and the performance of the health system.

- Objective 1.1: Promote affordable health care, while balancing spending on premiums, deductibles, and out-of-pocket costs

AcademyHealth supports HHS' important work to reduce healthcare costs and promote more affordable health care, an undertaking that is directly informed by health services research. This field of science diagnoses problems in health services and health care delivery and identifies possible solutions for use by policymakers, providers, employers, and others. Health services research helps decision makers understand what interventions or strategies work, for whom, when, and under what circumstances. Importantly, it also helps us understand how innovative practices that work in one setting can be implemented effectively elsewhere, potentially saving time, money, and other resources. Health services and implementation research is crucial for understanding the drivers of health care costs, identifying potential strategies for reducing these costs, and evaluating the intended and unintended consequences of cost-reduction strategies as they are being implemented. Much of what we know today about key opportunities and challenges for reducing health care costs and promoting affordability is rooted in this field of research.

Moving forward, we encourage HHS to continue to seek out and support the production and use of evidence from health services research to help address health care costs and affordability. This includes research into how consumers make decisions about health insurance and health care services as well as what tools are most effective for promoting informed decision-making. It also includes comparative effectiveness research that includes costs and value. Further work is also needed to promote the development and spread of new payment models, identify effective strategies to foster high-value care, eliminate low-value care, and implement policies that help reduce health insurance costs for consumers, among other priority areas.

- Objective 1.2: Expand safe, high-quality healthcare options, and encourage innovation and competition

AcademyHealth supports HHS' important work to improve the safety and quality of health care and promote innovation, an undertaking that is directly supported by federally funded health services research. This field of science diagnoses problems in health care and public health delivery and identifies possible solutions for use by policymakers, providers, employers, and others. Health services and implementation research helps decision makers understand what interventions or strategies work to promote safe, high quality, innovative care, for whom, when, and under what circumstances. Importantly, it also helps us understand how innovative practices that work in one setting can be implemented and/or adapted effectively elsewhere, potentially saving time, money, and other resources. Health services and implementation research is crucial for understanding a range of issues relevant to quality, safety, and innovation in the provision of health care services, such strategies for preventing healthcare-associated infections, the development and implementation of new





payment models to incentivize high-quality care, and implementation of models for promoting coordinated care across provider types, among other priority areas.

The Agency for Healthcare Research and Quality has made important contributions here working collaboratively with many other HHS agencies. However, much work remains to be done as the National Healthcare Quality and Disparities Reports annually document. While progress is real, the pace of improvement needs to be accelerated through bold investments in partnership with the private sector. We also need to invest in the science to allow for proper risk adjustment of quality measures that incorporates the influence of social determinants and other key patient reported measures (e.g., financial stress, availability of social support).

Moving forward, AcademyHealth encourages HHS to expand upon and leverage existing research and evidence based tools as it pursues strategies for improving health care safety and quality. As one example, work supported by the Agency for Healthcare Research and Quality and the National Institute on Minority Health and Health Disparities provides existing knowledge regarding health disparities on which to build future efforts to address disparities in quality and safety. We also encourage HHS to continue to support research that helps us understand how to translate existing evidence for diverse audiences and communities, disseminate it to policymakers, health systems, providers and others, and implement research findings to improve health care practice. Investing in this area of work is key to ensuring that important knowledge relevant to improving health and the performance of the health system reaches those who can use it.

- Objective 1.3: Improve Americans' access to health care and expand choices of care and service options

AcademyHealth supports HHS' important work to improve Americans' access to health care and expand consumer choice, an undertaking that is directly informed by health services research. This field of science diagnoses problems in health care and public health delivery and identifies possible solutions for use by policymakers, providers, employers, and others. Health services research helps decision makers understand what interventions or strategies work, for whom, when, and under what circumstances. Importantly, it also helps us understand how innovative strategies that work in one setting can be implemented effectively in other markets, communities and states, potentially saving time, money, and other resources. Health services research is crucial for understanding a range of issues relevant to health care access and choice, such as how Americans understand their options for care, the implications of various strategies for expanding coverage options, and the effectiveness of various strategies for reducing disparities in access, among others. Moving forward, AcademyHealth encourages HHS to leverage existing research, including the rich data assets from the Agency for Healthcare Research and Quality (e.g. MEPS, HCUP, CAHPS) as it pursues strategies for improving health care access and choice, and to continue to support the conduct and rapid and wide dissemination of research evaluating the impact of these strategies.





- Objective 1.4: Strengthen and expand the healthcare workforce to meet America's diverse needs

AcademyHealth shares HHS' commitment to supporting a highly trained, accessible, and diverse healthcare workforce to meet the nation's healthcare needs. In fact, understanding current trends, opportunities, and challenges facing the U.S. healthcare workforce and evaluating potential solutions is an important area of health services research, the field in which our members work. Health services research is a valuable resource for understanding a wide range of workforce-related topics, such as the relationship between the workforce and healthcare access, quality, and cost, and strategies for enhancing workforce diversity. Health services research also helps us measure workforce supply, distribution, demand, need, and competencies and their evolution to respond to the changing needs of our population. However, we affirm that the healthcare workforce also includes individuals working in diverse settings who have been trained in health services research and are designing, evaluating and implementing interventions to improve care and outcomes.

Thus, AcademyHealth suggests that another important strategy for HHS in meeting its objectives for the healthcare workforce is supporting policies that fund health services research as well as training programs for the professionals who produce this important work. These training programs and other career development opportunities in health services research are sorely needed. Like basic and clinical research, the field of health services research faces challenges in developing young scientists—a paucity of training opportunities, poorly supported training centers and mentors, delayed success in securing the coveted first R01, and challenges in recruiting and retaining underrepresented racial and ethnic minorities into research careers, which in turn results in lack of diversity in the current research workforce. We believe this lack of diversity must be addressed, as the inclusion of investigators from diverse backgrounds—including, but not limited to, discipline, race/ethnicity, career stage, and gender—is critical to providing the fullest possible picture for the research enterprise, including helping to identify appropriate and relevant research questions, build relationships and improve engagement with diverse communities, and better disseminate and translate research for a wide variety of stakeholders. At a time when the rapidly changing health care landscape requires a cadre of professionals skilled in the use of alternative methods and large data sets, HHS should prioritize investments that support training for a diverse pool of health services and implementation researchers.

Strategic Goal 2: Protect the Health of Americans Where They Live, Learn, Work, and Play

AcademyHealth appreciates the opportunity to provide input to the U.S. Department of Health and Human Services (HHS) on the strategic goals, associated objectives and strategies presented in the draft HHS Strategic Plan, FY 2018 – 2022. We are the nonpartisan, professional home for more than 4,000 health services researchers, policy analysts, practitioners, and organizations whose work helps us understand and improve care for individuals, strengthen the performance of the health system, and enable better health outcomes for more people, at greater value.



We agree with the agencies listed as working to achieve this goal and in particular the important roles of the Agency for Healthcare Research and Quality and the National Institutes of Health in developing the evidence base for action and measurable progress.

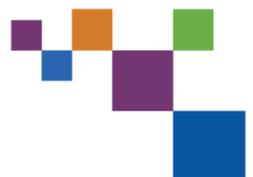
Across the areas of focus under this goal, rigorous *and* timely evaluation studies will be crucial for helping HHS and other decision makers understand the impact of the strategies they test and then refine these strategies moving forward. AcademyHealth encourages HHS to establish and promote open data policies that encourage and do not restrict access to and sharing of data in structured, machine-readable formats, in timely and appropriate ways, so that it may be used by researchers, innovators, and others to generate actionable evidence and to inform policymakers and others on progress toward this objective. We also encourage HHS to establish and promote policies that encourage sharing and do not restrict access to the *results of evaluations* so that all decisionmakers -- in the public and private sectors -- have access to the information they need to make the best choices to improve health and the performance of the health system.

- Objective 2.2: Prevent, treat, and control communicable diseases and chronic conditions

AcademyHealth supports HHS' important objective to prevent, treat, and control communicable diseases and chronic conditions. We believe that, in addition to the contributing agencies listed in the Strategic Plan, the Agency for Healthcare Research and Quality (AHRQ) is another valuable partner within HHS for addressing communicable diseases and chronic conditions. AHRQ supports research and evaluation on a range of issues relevant to optimizing the health care delivery system to support prevention and the management of chronic care, and helps provide doctors and other clinicians with the best available evidence to inform decisions about patient care. AHRQ also supports research to improve health care delivery systems, producing valuable insights into how these systems work, how they might be strengthened, and how promising interventions tested in one setting can be adopted and implemented in other settings. Moving forward, we encourage HHS to leverage the rich information and knowledge generated by AHRQ as it works to strengthen health system responses to address and manage communicable diseases and chronic conditions.

- Objective 2.3: Reduce the impact of mental and substance use disorders through prevention, early intervention, treatment, and recovery support

AcademyHealth applauds HHS for its support of evidence-based interventions to reduce the impact of mental and substance use disorders and to improve outcomes. Evidence-based interventions are at the heart of health services research, which helps health care providers, policymakers, and others understand what works, for whom, and under what circumstances. Importantly, this area of science also helps us understand how an intervention that works in one setting can be implemented effectively elsewhere, potentially saving time, money, and other resources. Health services research helped inform the types of behavioral health-focused, evidence-based practices identified in the Strategic Plan and is a continued resource for HHS in further evaluating the effectiveness of these practices. Yet, we have seen significant decreases over the last 10 years in the amount of health services research funded by the National Institute of Mental Health. Given the significant toll of mental and





behavioral health disorders on our population today, and their attendant costs, we believe that HHS should reverse this trend.

AcademyHealth was especially pleased to see recent efforts by the Substance Abuse and Mental Health Services Administration (SAMHSA) to address barriers to the sharing of patient records pertaining to substance use disorders, which is key for enabling vital research into diseases that afflict some of this nation's most vulnerable populations. Moving forward, we encourage HHS to continue to support policies and practices that support, and do not unnecessarily restrict, the appropriate and timely use of data for research and evaluation.

- Objective 2.4 Prepare for and respond to public health emergencies

Public health emergencies, such as the current opioid epidemic, demand preparedness and response capacity in our communities and health care systems. The Agency for Healthcare Research and Quality supports other agencies and contributes to this goal with data documenting the scale and impact of the emergency as well as the evidence and tools for health systems to respond. A good example of this was a project funded by AHRQ out of the emergency preparedness portfolio, whereby an atlas of the role and special needs of nursing homes in a disaster was used by the Secretary to inform the response following Hurricane Katrina. Contract researchers from the project team were deployed to work side by side in the Humphrey Building Command Center for 16 weeks, generating updated maps on the status of nursing home facilities and targeting areas for Federal response.

Strategic Goal 3: Strengthen the Economic and Social Well-Being of Americans across the Lifespan

AcademyHealth appreciates the opportunity to provide input to the U.S. Department of Health and Human Services (HHS) on the strategic goals, associated objectives and strategies presented in the draft HHS Strategic Plan, FY 2018 – 2022. We are the nonpartisan, professional home for more than 4,000 health services researchers, policy analysts, practitioners, and organizations whose work helps us understand and improve care for individuals, strengthen the performance of the health system, and enable better health outcomes for more people, at greater value.

We agree with the agencies listed as working to achieve this goal and in particular the important roles of the Agency for Healthcare Research and Quality in developing the evidence base for action and measurable progress. In addition, the National Institutes of Health, through their investments in health services research and implementation research, also supports this goal.

Across the areas of focus under this goal, rigorous *and* timely evaluation studies will be crucial for helping HHS and other decision makers understand the impact of the strategies they test and then refine these strategies moving forward. AcademyHealth encourages HHS to establish and promote open data policies that encourage and do not restrict access to and sharing of data in structured, machine-readable formats, in timely and appropriate ways, so that it may be used by researchers, innovators, and others to generate actionable



evidence and to inform policymakers and others on progress toward this objective. We also encourage HHS to establish and promote policies that encourage sharing and do not restrict access to the *results of evaluations* so that all decision makers -- in the public and private sectors -- have access to the information they need to make the best choices to improve health and the performance of the health system.

- Objective 3.2: Safeguard the public against preventable injuries and violence

AcademyHealth applauds HHS' efforts to safeguard the public against preventable injuries and violence and urges a continued focus on developing, testing, and widely disseminating evidence-based interventions to reduce preventable injuries and violence. Evidence-based interventions are at the heart of health services research whether at the individual, system, community, or population level and helps policymakers, and others understand what works, for whom, and under what circumstances. Importantly, this area of science also helps us understand how an intervention that works in one setting can be implemented or adapted effectively elsewhere, potentially saving time, money, and other resources. AcademyHealth supports efforts by HHS to identify and disseminate evidence-based practices to reduce injuries and violence. Consistent with all other areas of data, research and evidence we also encourage the department to review and update guidance to agencies to remove any barriers to data and the production of evidence on the full spectrum of potential strategies to reduce preventable injuries and violence, including the removal of existing restraints on federally-funded research into the prevalence and prevention of gun violence.

- Objective 3.3: Support strong families and healthy marriage, and prepare children and youth for healthy, productive lives

AcademyHealth commends HHS for its support of the nation's children, youth, and families, particularly through investments in research and the development of evidence-based practices to improve health and health care. Health services research provides a rich source of information for policymakers, community-based organizations, health and social service providers, and other stakeholders working to support healthy children and youth and to support strong families. As one example, health services research is contributing to our understanding of how abuse and other types of adverse childhood experiences (ACEs) affect health and well-being, health care utilization, and costs throughout a person's lifetime. Importantly, this field of study also helps identify, test, and refine strategies for preventing ACEs and mitigating their effects to help children, youth, and their families live healthy and productive lives. A recent action and policy agenda to address ACES was published by AcademyHealth and partners which outlines a series of actions that public and private sector stakeholders, including HHS, can take to improve our nation's response to ACES. This is but one example of how investments in research today help improve the health of individuals and communities for years to come.

Strategic Goal 4: Foster Sound, Sustained Advances in the Sciences





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We agree with the agencies listed as working to achieve this goal and in particular the important roles of the Agency for Healthcare Research and Quality and the National Institutes of Health in developing the evidence base for action and measurable progress.

Across the areas of focus under this goal, rigorous *and* timely evaluation studies will be crucial for helping HHS and other decision makers understand the impact of the strategies they test and then refine these strategies moving forward. AcademyHealth encourages HHS to establish and promote open data policies that encourage and do not restrict access to and sharing of data in structured, machine-readable formats, in timely and appropriate ways, so that it may be used by researchers, innovators, and others to generate actionable evidence and to inform policymakers and others on progress toward this objective. We also encourage HHS to establish and promote policies that encourage sharing and do not restrict access to the *results of evaluations* so that all decisionmakers -- in the public and private sectors -- have access to the information they need to make the best choices to improve health and the performance of the health system.

- Objective 4.1: Improve surveillance, epidemiology, and laboratory sciences

AcademyHealth supports efforts by HHS to facilitate the sharing, exchange, and alignment of public health surveillance data and encourages HHS to adopt this approach in its treatment of other types of health data as well. We support data transparency and access to data for research purposes, and the translation of that evidence to inform health care decision making by policymakers, health care providers, and patients. In current practice, the process for securing and using federal data—whether claims, survey, or other data—in health services research is often cumbersome, restrictive, detrimentally lengthy, and/or cost prohibitive. Among the challenges are regulatory policy and administrative practices that impose additional, and in our view, often unnecessary burdens unrelated to privacy, security, or other legitimate interests. As one consequence, these policies and practices can create barriers to information-sharing within and across health systems or with community-based partners. That information is essential for sound research into the transformational care delivery advances, population health, and affordability of health care. Across data types, AcademyHealth encourages HHS to pursue new strategies for sharing data across all levels of government and with non-governmental partners who can translate that data into actionable evidence to improve care.

- Objective 4.2: Expand the capacity of the scientific workforce and infrastructure to support innovative research



AcademyHealth applauds HHS for its commitment to supporting a highly trained and efficient scientific workforce as well as the data, facilities and other resources required to address the country's biomedical and scientific research needs. In carrying out this important work, AcademyHealth encourages HHS to support policies that expand training opportunities for all phases of research from discovery to development to delivery and thus, including health services and implementation research. Any one type of research on its own cannot effectively or appreciably improve health; rather, the various research disciplines work in concert, and each plays an essential role. The health services research field faces similar challenges as basic and clinical research fields in developing young scientists—a paucity of training opportunities, poorly supported training centers and mentors, delayed success in securing the coveted first R01, challenges in recruiting and retaining underrepresented racial and ethnic minorities into research careers, and a loss of talent to other fields. At a time when the rapidly changing health care landscape requires a cadre of professionals skilled in the use of alternative methods and large data sets, HHS should prioritize investments in training health services and implementation researchers.

AcademyHealth particularly appreciates HHS explicitly noting its interest in ensuring that a diverse pool of investigators is prepared to address a wide range of important questions. There is a lack of diversity in the current health research workforce, and this must be addressed. We believe the inclusion of investigators from diverse backgrounds—including, but not limited to, discipline, race/ethnicity, career stage, and gender—is critical to providing the fullest possible picture for the research enterprise, including helping to identify the right research questions, build relationships and improve engagement with diverse communities, and better disseminate and translate research for a wide variety of stakeholders. It is important that future iterations of HHS policies further promote diversity across the HHS-supported research enterprise.

Finally, as HHS considers strategies for promoting ethical and responsible research, we encourage HHS to expedite release of the new Federal Policy for the Protection of Human Subjects, or the Common Rule. AcademyHealth endorses policies that set ethically and morally rigorous standards for conducting research and that protect human subjects from physical, psychological, and informational risks. Health services researchers—from an array of disciplines ranging from outcomes research to health economics—are subject to the Common Rule. Regardless of discipline, we all are committed to ensuring that individuals who participate in health services research are protected, and that the data with which we work are collected, used, and stored ethically and appropriately. To achieve this goal, AcademyHealth suggests that HHS expedite its review and release of the updated Common Rule.

- Objective 4.3: Advance basic science knowledge and conduct applied prevention and treatment research to improve health and development

AcademyHealth applauds HHS' continued support of basic science and applied research to help improve the health and well-being of all Americans. As part of this commitment to applied research, we encourage HHS to continue to support research investments that are reflective of the whole research continuum, considering the role of health services research in addition to basic and clinical research. While medical research discovers cures for





diseases, health services research discovers innovative cures for the health system and produces actionable evidence for use by policymakers, providers, employers, patients, and others. For example, delivery system science (another type of health services research) explores a range of issues relevant to optimizing health care delivery systems, producing valuable insights into how these systems work, how they might be strengthened, and how promising interventions tested in one setting can be adopted and implemented in other settings. In fact, delivery system science is a key resource for HHS in advancing the strategies presented as part of its strategic goal to reform, strengthen, and modernize the nation's health care, and we encourage HHS to continue to support policies that fund this important area of work.

- Objective 4.4: Leverage translational research, dissemination and implementation science, and evaluation investments to support adoption of evidence informed practices

AcademyHealth applauds HHS for recognizing the important role that translational research, dissemination and implementation science, and evaluation play in supporting adoption and spread of evidence-informed practices to improve health and the performance of health systems. We believe these fields of study are crucial for ensuring that findings from federally-supported research are understood and used by policymakers, providers, and other key decision makers, and that the specific strategies HHS employs in pursuit of its objectives are continually refined and strengthened. Investment in a sound evidence base minimizes the wasteful duplication of research and care delivery resources. Dissemination and implementation research supported by the Agency for Healthcare Research and Quality has produced such evidence, documenting cost savings and quality improvements in areas such as elimination of waste, reduction in unwarranted variation in practice, and elimination of low value care. In this way, health services and implementation research is an essential resource for HHS in meeting the strategic goals presented in its draft Strategic Plan, and we encourage HHS to continue to support policies that fund this important area of work. In particular, we note that support for health services research projects at the National Institutes of Health has declined over the last decade based on data from the National Library of Medicine. In some Institutes, such as the National Institute of Mental Health, this is a very significant decline.

