

21st Century Cures Initiative: Comments to the House Energy and Commerce Committee

June 16, 2014

The Partnership to Improve Patient Care (PIPC) supports the Committee's 21st Century Cures Initiative and the goals of accelerating discovery, development, and delivery of innovative treatments for many diseases that do not currently have treatment options. We applaud the Congress, and in particular Chairman Fred Upton and Congresswoman Diana DeGette for leading this bipartisan effort. Thank you for seeking comments to address this issue. We are very pleased to have this opportunity to provide input.

Comprised of 48 organizations and growing, PIPC has recognized the importance of promoting health care delivery systems that support the related goals of patient-centeredness and medical progress through innovation and ongoing clinical research and analysis. Our founding principles on comparative effectiveness research (CER) emphasize these goals by calling for strong patient access protections in the use of CER, explicit alignment of CER with innovation, and improved communication and recognition of the value of innovation. As we seek to address continued, significant areas of unmet medical need and to realize significant opportunities for improving the efficient delivery of high quality care, innovation means many things -- new treatments, improvements to existing treatments, efficiencies in the delivery system, higher quality care and overall a reduction in the economic and health burden of disease.

As health care decision-makers increasingly are adopting CER-based evidence and tools, PIPC has advocated for a delivery system that supports informed patient choice from a range of treatment options and explicitly recognizes and incentivizes innovation as an element of patient-centeredness.

The Committee is taking a comprehensive approach and PIPC applauds its work. We believe that to effectively support innovation, the Committee must consider both regulatory reforms to accelerate innovation and focus on supporting a delivery system that can accommodate and provide patient access to these advances. Innovation and access are equally important to patients.

Our recommendations below are based on our experience with advancing patient-centered CER. Thank you for your consideration of these principles:

- Explicitly align policy with innovation: If existing regulatory or reimbursement policy is a barrier to either the development of improvements in the science or patient access to these advances, then those barriers should be re-evaluated and removed;
- Provide a meaningful voice to patients: In all appropriate venues where policy around the value of innovation is being measured, the patient voice should be included and ultimately reflected in the decision-making process;

- Protect against policies that impose blunt access restrictions to medical options that are best suited to individual patients: Medical management tools should be patient-centered and not based on one-size fits all evidence standards;
- Foster informed choices from the range of clinical/care options: Patients and providers can both advance innovation and benefit from it when reliable, accurate information is more readily available through modern information sharing tools;
- Incorporate constructs that were designed with the help and expertise of the patient community: PCORI created a new way to develop and design patient-centered outcomes research but the statute also includes protections around the misuse of innovative research;
- Ensure transparency and accountability as payment and delivery models evolve (i.e. ACOs and alternative payment models);
- Make the conversation about innovation as broad as possible to maximize the value to patients: It should be holistic and view the needs of patients across the care continuum.

PIPC greatly appreciates the opportunity to share our high-level principles and recommendations with the Committee. We are excited and grateful for your commitment to this critically important dialogue around how to support innovation and improve health care overall. PIPC is developing a more comprehensive white paper on advancing innovation through evidence-based, patient-centered care in alternative payment models and looks forward to sharing this with the Committee very soon.