



AMERICAN COLLEGE OF PHYSICIANS  
INTERNAL MEDICINE | *Doctors for Adults*

August 26, 2008

The Honorable Max Baucus  
United States Senate  
Washington, DC 20510

The Honorable Kent Conrad  
United States Senate  
Washington, DC 20510

Dear Chairmen Baucus and Conrad:

The American College of Physicians, representing over 126,000 physicians and students of internal medicine, commends your recent introduction of the Comparative Effectiveness Research Act of 2008 (S. 3408). The College strongly supports the increased development of comparative effectiveness information. This information is necessary for our members to work with their patients to develop effective, patient-centered treatment plans, and for all healthcare payers to ensure value in their healthcare decisions. The processes defined in this legislation provide a suitable, well thought-out structure towards providing substantially improved availability of this important information.

The College is particularly pleased with the following features of the proposed Health Care Comparative Effectiveness Research Institute:

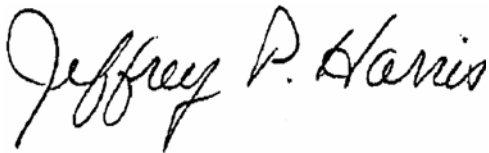
- The Institute's establishment as an entity with adequate, established public and private financial support.
- The Institute's organization, including its private corporate structure, established funding, conflict of interest policies, transparency policies and prohibitions against donations, gifts and bequests that serve to protect it from undue government or private sector influence
- The establishment of a Board of Directors that includes representation from all relevant stakeholders, and the requirement of specific processes to ensure transparency and access throughout the evidence development process, serve to promote trust in the entity and will facilitate broad acceptance of the entity's activities and findings.
- The implementation of a prioritization process with input from stakeholder groups ensures that the comparative effective evidence developed by the entity will have the greatest positive effect on improving the quality and value of the overall health care provided in the country.

- The establishment of an expert Methodology Committee to develop standards to be used in the conduct of the research, coupled with the availability of expert advisory committees and the insistence that all research be subject to the peer review process, promotes the development of valid comparative effectiveness information.
- The establishment of provisions to disseminate the comparative effectiveness information developed to clinicians, patients and the public in a comprehensible manner ensures the availability of this information for the public good.

The College was disappointed that the initial activities of this entity will be limited to the development of comparative clinical information, with possible future inclusion of cost effectiveness factors following an examination by the Methodology Committee (through a contract with the Institute of Medicine) of methods by which cost-effectiveness and value can be assessed in the most scientifically based and standardized way. The College believes that both comparative clinical and cost-effectiveness information are necessary factors to be explicitly considered in the evaluation of a clinical intervention, and encourages the inclusion of developing cost effectiveness data within the Institute's purview as soon as possible.

The College believes that the establishment of the Health Care Comparative Effectiveness Research Institute goes a long way towards providing much needed clinical comparative information and promoting more effective and value-oriented care throughout our healthcare system. It will build on the excellent, but inadequately funded, comparative effectiveness activities currently being engaged in by the Agency for Health Research and Quality (AHRQ). The College offers its many resources to you and your staff to assist in making this proposed entity a reality.

Respectfully,

A handwritten signature in black ink that reads "Jeffrey P. Harris". The signature is written in a cursive, flowing style.

Jeffrey P. Harris, MD, FACP  
President