



**Department of Health and Human Services Listening Session
On Research Priorities under the Medicare Modernization Act of 2003
Comments of Helen Darling, President, National Business Group on Health
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As President of the National Business Group on Health, representing 211 member companies, including many of America's largest employers, I am pleased to offer some thoughts and suggestions on priorities for research to improve the effectiveness and efficiency of public health care programs, particularly the Medicare program.

First Priority for Research Should Be Prescription Drugs

First, I would concur with HHS that the first priority should be a focus on prescription drug research, given last year's enactment of the Medicare prescription drug benefit. Focusing research efforts on prescription drugs will help us all be more prudent purchasers and users of prescription drugs. The role of pharmaceuticals in health care continues to grow, as does their cost. Although we spend less on prescription drugs than what we spend on hospital care and physician services, each year we see entirely new drugs and many more drugs that are similar to existing ones introduced into the health care marketplace. Unfortunately, for most of these medications, we know little about their effectiveness beyond comparison to a placebo.

Comparative Effectiveness Studies Would Be of Most Value

Therefore, I urge you to focus research efforts on the comparative clinical effectiveness of prescription drugs. Purchasers –both public programs and private plans—and consumers need such comparative information to make smart choices about health care. As we ask individuals to get more involved in decisions about their own health care and to play a greater role in the management of their own care, they need to know how effective a prescription drug is in treating their particular condition or ailment.

I would also add that, in many cases, even well-informed doctors and other health care providers also often do not have basic information, let alone the latest, objective information on effectiveness of prescription drugs for particular patients with particular conditions.

Studies Should Compare Prescription Drugs with Alternative Medications and Therapies for the Condition

Comparative effectiveness studies should truly be comprehensive to be most beneficial for patients, providers, and payers. Studies should compare the effectiveness of a pharmaceutical with existing medications as well as with non-prescription treatments and therapies for the conditions for which the new drug would potentially be an alternative. That is, the comparison should not be limited to medications within the same drug class and the comparison should not be limited to other medications.

Such research would fill a great void that currently exists. As you know, in the United States, new drugs are largely evaluated for effectiveness against a placebo. As a result, we know little about their effectiveness relative to other medications and alternative treatments already in use.

More and better information about how well a medication works compared to existing treatments and other medications will promote more rational adoption of medicines and help to control our burgeoning health care costs. This research will not only identify when lower-cost treatments are as good or better than more expensive alternatives, but will also identify when more costly drugs and therapies provide greater benefit. It will increase the value of our public and private dollars spent on prescription drugs.

Synthesis of Existing Evidence Should Be the Next Research Priority

Looking ahead to research priorities in the future, I would recommend that the future focus be on synthesizing existing evidence of the effectiveness of prescription drugs and other medical treatments and interventions. There are large gaps in information about currently used medications and therapies. Such syntheses would help make existing research more useful to consumers, providers, and purchasers by identifying high quality research, screening out research of limited value or integrity, facilitating comparisons among alternatives (true apples to apples comparisons), and identifying the specific conditions and specific patients for which specific treatments are most effective.

Partnership Between Public and Private Sector Needed To Make Effectiveness Information Available Sooner

In addition, another priority should be to establish a new partnership between HHS and the business community to make evidence about the effectiveness of promising new medical technologies and interventions as well as information about the ineffectiveness of outmoded technologies and interventions available faster so that providers can make the necessary changes in practice patterns more rapidly. As you know, what commonly happens is that a new medical technology or therapy is layered upon existing technologies and therapies as a complement rather than as a replacement. The faster we can get information about new and outmoded technologies and interventions the better.

Consumers and payers will also benefit from faster and more readily available information about new medical innovations. Our health care system can no longer afford a health care system that does not use the latest evidence-based best practices.

Thank you for the opportunity to comment on behalf of our country's large employers.