



May 24, 2022

**Association of
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Submitted electronically to PCORTF@ahrq.hhs.gov

Agency for Healthcare Research and Quality
5600 Fishers Lane
Rockville, MD 20857
Attn: Karin Rhodes, MD, Chief Information Officer

Re: Request for Information: AHRQ's Proposed Patient-Centered Outcomes Research Trust Fund Strategic Framework (<https://www.govinfo.gov/content/pkg/FR-2022-02-18/pdf/2022-03551.pdf>)

The Association of American Medical Colleges (AAMC) appreciates the opportunity to submit comments to the Agency for Healthcare Research and Quality (AHRQ) about AHRQ's Proposed Patient-Centered Outcomes Research Trust Fund Strategic Framework (the strategic framework).

The AAMC is a nonprofit association dedicated to improving the health of people everywhere through medical education, health care, medical research, and community collaborations. Its members comprise all 155 accredited U.S. and 16 accredited Canadian medical schools; approximately 400 teaching hospitals and health systems, including Department of Veterans Affairs medical centers; and more than 70 academic societies. Through these institutions and organizations, the AAMC leads and serves America's medical schools and teaching hospitals and the millions of individuals employed across academic medicine, including more than 191,000 full-time faculty members, 95,000 medical students, 149,000 resident physicians, and 60,000 graduate students and postdoctoral researchers in the biomedical sciences. In 2022, the Association of Academic Health Centers and the Association of Academic Health Centers International merged into the AAMC, broadening the AAMC's U.S. membership and expanding its reach to international academic health centers.

The AAMC supports AHRQ's approach of developing a strategic framework to guide Patient-Centered Outcomes Research Trust Fund (PCORTF) investments, and we provide the following comments in response to the specific questions raised in the Request for Information. We also encourage AHRQ to review AAMC's statements submitted to the Patient-Centered Outcomes Research Institute (PCORI) in response to its proposed National Priorities for Health¹ and its Proposed Research Agenda², as the information provided in those statements is relevant as AHRQ approaches its strategic planning process. In those letters, the AAMC supported PCORI's strategic planning process and its development of the priorities around long-term goals for

¹ See AAMC Comment Letter, [PCORI's National Priorities for Health: Proposed Priorities for Public Comment](#) (August 27, 2021).

² See AAMC Comment Letter, [PCORI's Proposed Research Agenda for Public Comment](#) (January 31, 2022).

health. As we wrote in August of 2021, “[w]e feel these priorities serve as effective pillars on which PCORI can build its research agenda.”

The AAMC is supportive of AHRQ’s proposed framework and finds that its components—the mission, overarching vision, high-level goal, high-level priorities and desired outcomes, and cross-cutting strategies for achieving desired outcomes— if implemented as proposed describe an appropriate strategy for directing future PCORTF investments. The AAMC agrees that the high-level priorities AHRQ has identified in the strategic framework address areas of importance for the future of health care delivery.

The AAMC has additional comments and suggestions on certain high-level priorities and desired outcomes in AHRQ’s strategic framework:

Health Equity

The AAMC strongly endorses the focus on health equity as a priority component of AHRQ’s strategic framework, as well as its inclusion in the broader vision of advancing *equitable whole-person care across the lifespan*. As AHRQ moves forward with this priority, we note that additional resources and connections are available to AHRQ through the work of the AAMC [Center for Health Justice](#). Founded in 2021 with a goal for all communities to have an opportunity to thrive—a goal that reaches well beyond medical care, the Center partners with public health and community-based organizations, government and health care entities, the private sector, community leaders, and community members to build a case for health justice through research, analysis, and expertise.

Patient and Community Engagement

The AAMC values AHRQ’s acknowledgement that patients and communities play an important role in the adoption of health interventions. Community engagement is critical to ensure that health information is disseminated in an appropriate and effective manner so patients can make informed decisions about their treatment. Please see the additional feedback we provided in our response³ to PCORI’s Science of Engagement Funding Initiative request for information. In that letter, we elaborated upon the themes of critical, bi-directional engagement, recognizing that research benefits from partnerships, stakeholder engagement, and community collaborations, and building trust is essential. This engagement should be conducted in a culturally humble and sensitive manner, including populations from diverse backgrounds, specifically those who have been traditionally underrepresented in medical research. Throughout its patient and community engagement efforts, we urge AHRQ to promote and prioritize connections between organizations, communities, and qualified researchers.

³ See AAMC Comment Letter, [PCORI Request for Information: Science of Engagement Funding Initiative](#) (November 19, 2021).

Trustworthiness

The AAMC is in strong agreement that enhancing trust in the healthcare system is a worthwhile priority. We note that rather than focusing on whether individuals trust organizations, in order to achieve health equity and address population health needs, we believe organizations must demonstrate to their communities that they are deserving of that community's trust. We commend to AHRQ the [Principles of Trustworthiness](#) to guide these efforts, a set of principles and connected [toolkit](#) developed by the AAMC Center for Health Justice with the engagement of community partners. We would be happy to further engage with AHRQ around this priority if these tools and resources would be useful.

The AAMC is concerned that public trust in science and medicine is eroding. An essential component of increasing trust is addressing the spread of false scientific and medical narratives and information. AHRQ should consider how these efforts could be included in its priorities. As a related example, the AAMC is engaged in a [strategic initiative](#) through a cooperative agreement with the U.S. Centers for Disease Control and Prevention to build confidence in COVID-19 vaccines and address medical misinformation and mistrust through health professions education. More information about this cooperative agreement can be found at [VaccineVoices](#).

Provider Wellness

The AAMC strongly supports the need to address provider well-being and stands ready to support the agency in its efforts to develop initiatives and outcomes related to this priority. As AHRQ moves toward implementing its strategic framework, we recommend that the agency consider support of evidence-based approaches for alleviating clinician burden and supporting the well-being of faculty, clinicians, researchers, learners, and staff.

To the extent that the AAMC efforts in this issue can be useful to AHRQ in moving this priority forward, we would be glad to provide you with resources developed in collaboration with our member organizations and their representatives to explore issues impacting well-being and approaches for promoting vitality in academic medicine, such as the AAMC Council of Faculty and Academic Societies Faculty Resilience Committee's report, [The Rise of Wellness Initiatives in Health Care: Using National Survey Data to Support Effective Well-Being Champions and Wellness Programs](#). This report highlights common elements of wellness programming and describes the roles of the well-being champions who lead and support wellness efforts. The report also presents recommendations for how medical schools and teaching hospitals can promote a culture of well-being and develop as well as support wellness leaders and initiatives.

Learning Health System Development and Advancement

The AAMC encourages AHRQ to continue identifying ways to provide the next generation of patient-centered outcomes researchers with effective training, educational support, and research opportunities and to develop the use of data and evidence to improve patient care and population health. We appreciate AHRQ's understanding of the importance of enhancing infrastructure

needed to enable the integration of research into care delivery, and value AHRQ's commitment to establish the [Learning Health Systems Centers of Excellence](#) in collaboration with PCORI. The proposed framework would allow AHRQ to expand these efforts.

Determination of National Health Priorities

Under high-level priority D ("High-Quality, Safe Care that is Aligned with National Health Priorities") we note that the proposed framework does not indicate how these national health priorities will be defined or determined. We recommend providing additional context as to how these priorities are identified and whether, for example, these are determined by AHRQ or PCORI or aligned with other efforts the Department of Health and Human Services undertakes.

In summary, the AAMC supports AHRQ's strategic framework to guide future PCORTF investments and we remain available to engage with AHRQ on the development and implementation of these priorities. If you have any questions regarding this response, please feel free to contact me or my colleagues, Heather Pierce, JD, MPH (hpierce@aamc.org) or Anne Berry, MPP (aberry@aamc.org).

Sincerely,

A handwritten signature in blue ink that reads "Ross McKinney, Jr., MD". The signature is stylized and includes a small circle at the end.

Ross McKinney, Jr., MD
Chief Scientific Officer

cc: David J. Skorton, MD, AAMC President and Chief Executive Officer
Janis Orłowski, MD, AAMC Chief Health Care Officer