May 17, 2022

Director Robert Otto Valdez
Agency for Healthcare Research and Quality
5600 Fishers Lane
Rockville, MD 20857

RE: Request for Information Regarding AHRQ’s Proposed Patient-Centered Outcomes Research Trust Fund Strategic Framework

Director Valdez,

The Association of Schools and Programs of Public Health (ASPPH) is pleased to submit comments in response to the request for information (RFI) published by the Agency for Healthcare Research and Quality (AHRQ) on its proposed strategic framework for the Patient-Centered Outcomes Research Trust Fund (PCORTF) investments.

ASPPH is the leading voice of academic public health and is entrusted with enhancing the quality of the next generation of the public health workforce. We represent 137 schools and programs of public health accredited by the Council on Education for Public Health (CEPH). Our membership includes over 10,800 faculty and over 72,000 students. ASPPH strives to strengthen the capacity of members by advancing leadership, excellence, and collaboration in public health education, research, and practice.

Specifically, the RFI asks for feedback on “1. AHRQ would like overall reactions to the strategic framework; is there any aspect of the framework that: a. Does not promote the vision of advancing equitable whole-person care across the lifespan? b. Does not address major challenges faced by the U.S. healthcare system? c. Could be improved (and if so, how)?” In addition, “5. How can AHRQ have the greatest impact and success at achieving the vision and mission of the strategic framework? b. What complementary partnerships and collaborations (both public and private) would increase the impact of AHRQ’s PCORTF investments?” and “6. Is there anything else you would like to share regarding the strategic framework?”

ASPPH notes the following inconsistencies within the strategic framework that impact the academic public health community detailed below:

1. AHRQ would like overall reactions to the strategic framework; is there any aspect of the framework that:

   a. Does not promote the vision of advancing equitable whole-person care across the lifespan?
      Research suggests the link between advancements in public health and better health outcomes. Over the years, life expectancy and quality of life have vastly improved due to developments in
public health. A vision to achieve equitable care across the lifespan must keep up with the pace of a rapidly evolving healthcare system. In turn, whole-person care should not rely on the health care delivery system alone, but should also take facets of public health and community level interventions into account.

b. Does not address major challenges faced by the U.S. healthcare system?
Integration of the public health and health care delivery systems is imperative. The COVID-19 pandemic shined a light on the critical need to link core public health functions with health care delivery methods. As the U.S. healthcare system strives to move in a value-based direction, it is still behind in adopting innovative population-level tools. The health care system, hospital systems in particular, uses the terminology “population health” ubiquitously to fill in the blanks related to its federal funding requirements. However, it is unclear whether this terminology clearly translates to “public health dimensions” and responds directly to the gap in engaging social determinants of health as risk associations with sickness, hospitalization and even readmission. AHRQ should invest more in opportunities to research, assess, and evaluate population health models and the degree to which they translate into facets of public health, as well as the potential for scalability. The member schools and programs of ASPPH stand ready to conduct this research.

c. Could be improved (and if so, how)?"
While we are pleased to see “increased uptake of evidence-based preventive services, early intervention, and secondary prevention” as a desired outcome, we urge the explicit mention of the role of “public health” and “population health” models in advancing equitable care. The framework should incorporate language that looks beyond individual care and embraces effective population health models to ensure access to equitable, quality care for all.

5. How can AHRQ have the greatest impact and success at achieving the vision and mission of the strategic framework?

b. What complementary partnerships and collaborations (both public and private) would increase the impact of AHRQ’s PCORTF investments?
As AHRQ strives to achieve its strategic framework, it must factor in the varying needs of populations based on location, demographics, socioeconomic status, and other components. Equitable care cannot be achieved through a one-size fits all approach. Collaborations with partners who offer diverse geographical representation and expertise is critical. Forming partnerships with national organizations such as the ASPPH can help provide AHRQ access to a network of leading academic institutions, researchers, and experts in the field.

6. Is there anything else you would like to share regarding the strategic framework?
The pandemic highlighted many inefficiencies in the healthcare system, such as health inequities, limitations to access, and misinformation and disinformation. Many of these issues can be addressed through better investments in public health and better integration of population health models in the health care system. We appreciate the opportunity to provide feedback on the PCORTF investments.
and urge AHRQ to consider emphasizing the need for exploring more “public health” and “population health” models. We also thank you for your specific interest in and attention to public health.

We thank AHRQ for consideration of ASPPH’s comments. If we can provide additional information please contact Beeta Rasouli, ASPPH’s Director of Advocacy and Federal Affairs, at brasouli@aspph.org, 202-296-1099, ext. 133, or Tim Leshan, ASPPH’s Chief External Relations and Advocacy Officer, at tleshan@aspph.org, 202-296-0518, ext.132.

Respectfully,

Laura Magaña
President & CEO
Association of Schools and Programs of Public Health