



January 16, 2009

Agency for Healthcare Research and Quality  
Agency Information Collection Activities:  
Proposed Collection;  
Comment Request  
attn: AHRQ Desk Officer

AcademyHealth, as the nonpartisan, professional society for nearly 3,800 health services researchers, policy analysts, and practitioners, welcomes the opportunity to respond to the request for information filed December 31, 2008 in the *Federal Register* on the proposed AHRQ Data Inventory. AcademyHealth supports the development of research and data needed to inform health policy and practice, and we are pleased to offer the following thoughts for your consideration on behalf of our members, the research community, and the public more broadly.

AcademyHealth views regularly collected administrative and other data about outpatient health services utilization to be a valuable resource for research, policy, and practice. We support AHRQ's efforts to better understand issues in developing data collection initiatives, redundancies in these initiatives, uses of available data, gaps in available information, similarities across data projects, and areas for possible collaboration and coordination. We believe this activity is necessary for AHRQ to perform its health care research and information dissemination functions, and believe AHRQ has proposed a reasonable approach to the collection of this data. **We believe the quality and utility of this activity could be enhanced if AHRQ were to expand the analysis to determine the extent to which the data are currently available to the research community, and if not, whether the data could be made available.**

We support data transparency and the access of data for research. We are concerned that the overall process for securing and using administrative data in health services research is cumbersome and restrictive. Researchers often face difficulties gaining access to and using administrative data – even those data that are required to be reported as a program performance matter. Restrictions to data access may be the result of regulatory policies and administrative practices that impose additional, and in our view unnecessary burdens unrelated to privacy, security, or other legitimate agency interests on data that are by law already in the public domain because they are part of a required program reporting system. AcademyHealth views the development and dissemination of administrative data as a public good, and encourage all data collection in initiatives to consider the extent to which the data could be made available to researchers.

Advancing Research, Policy and Practice

Thank you for the opportunity to comment on the proposed AHRQ Data Inventory. Please feel free to contact me by phone at 202.292.6700 or by e-mail at [david.helms@academyhealth.org](mailto:david.helms@academyhealth.org) with any questions on our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "W. David Helms", with a long horizontal flourish extending to the right.

W. David Helms, Ph.D.  
President & CEO