January 12, 2016

Institute for Clinical and Economic Review
One State Street
Suite 1050
Boston, MA 02109 USA

Re: Comments Regarding the Institute for Clinical and Economic Review (ICER) Draft Report on Nucala® (Mepolizumab) for Asthma submitted to ctaf@icer-review.org

To Whom It May Concern:

The Asthma and Allergy Foundation of America (AAFA), a not-for-profit organization founded in 1953, is the leading patient organization for people with asthma and allergies, and the oldest asthma and allergy patient group in the world. AAFA is dedicated to improving the quality of life for people with asthma and allergic diseases through education, advocacy and research. AAFA provides practical information, community-based services and support through a broad set of digital channels, and through a national network of chapters and support groups. AAFA provides health education (to people with asthma and their families and caregivers and to professionals working with people with asthma); organizes state and national advocacy efforts; and funds and advocates for research that will advance the basic science relevant to treatment and cure, and for translational research that will increase the consistency with which the biomedical science that we have is applied. AAFA promotes public policy initiatives that improve and protect quality of life and treatment options for those affected by asthma and allergies. AAFA’s major public policy priorities are to:

• Promote access to affordable, quality healthcare for the treatment and management of asthma and allergies for all people;
• Maximize funding for basic, clinical, preventive, and health services research; and
• Promote prevention, screening, and lifestyle interventions that reduce the incidence and adverse effects of asthma and allergies.

AAFA is leveraging emerging digital health and engagement technologies and embracing 21st century approaches to education, advocacy and research. AAFA currently has a growing and committed online community of parents and family caregivers managing allergic diseases and asthma and a robust patient engagement platform. AAFA is in the process of launching a patient registry to collect, aggregate, and integrate data across multiple data sources (patient-sourced from the patient community; clinical data from provider sources; genomics data) in a structured and systematic manner.

AAFA recognizes the value of patient generated and patient reported data from people with asthma, as a source for insight itself and in combination with data from other sources (health insurance claims, electronic health records, genetics/genomics data). Such data will support
a broad range of analytics that can provide critical new insights into the biology of the disease, and the behavioral challenges that people with asthma face. Such analyses should also help to inform efforts to identify solutions that individuals, or groups of individuals, may have discovered; we believe that analysis of variation in patient outcomes can be an important vehicle for promoting learning and the accelerated diffusion of local innovation. We expect, finally, that insights derived from patient-sourced data will deepen our understanding of the barriers that limit the realization of best outcomes for different kinds of individuals with asthma. These insights are relevant both to understanding the biology of asthma and to advancing clinical research regarding the epidemiology of asthma, related co-morbidities, treatments and potential cures.

AAFA is pleased to have the opportunity to comment on ICER’s draft report, “Mepolizumab for the Treatment of Severe Asthma with Eosinophilia: Effectiveness, Value, and Value-Based Price Benchmarks.” ICER is to be commended for a thorough, thoughtful, and rigorous evaluation of a challenging issue, in the face of limited data.

AAFA is eager to assist both ICER and the policy community in capitalizing on opportunities to understand how to assure that patients with severe asthma achieve the outcomes that are possible, given “Standard of Care,” and to execute strategies and tactics that will lead the nation toward that goal.

Respectfully submitted,

Cary Sennett, MD, PhD, FACP
President and CEO