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Society of General Internal Medicine Comment on Research Data Request and Access Policy Changes

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The Society of General Internal Medicine (SGIM) is the leading society for academic general internal medicine physicians across the United States. SGIM represents more than 3,300 physicians including many members who conduct federally funded research that uses claims data from Medicare and Medicaid. In response to the request for information on *Important Research Data Request and Access Policy Changes* from the Centers for Medicare & Medicaid Services (CMS), this letter describes SGIM's significant concerns related to the policy implications of changes to claims data access, cost, and pricing.

SGIM believes that the planned changes will be detrimental to the research community at large whose use of CMS claims data is critical for the advancement of evidence-based primary care practice and policy. We believe that the changes described in the policy will drastically impede scientific progress in the study of healthcare access, utilization, disparities, and health policy. Employing the policies described in the RFI will be disruptive to existing research projects, and curtail the breadth of future projects, because of the significant costs quoted by CMS and need for Virtual Research Data Center (VRDC) seats to undertake the work.