



AMERICAN COLLEGE OF PHYSICIANS
INTERNAL MEDICINE | *Doctors for Adults*®

June 8, 2009

Charlene Frizzera
Acting Administrator
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Mail Stop C4-03-06
Baltimore, MD 21214

Dear Ms. Frizzera:

As it has in the past, the American College of Physicians (ACP), representing over 128,000 internists and medical students, supports the multi-specialty practice expense survey to collect recent, reliable, consistent practice expense data for all physician specialties and health care professions. ACP writes now to urge the Centers for Medicare and Medicaid Services (CMS) to use data collected from the recent survey to identify practice costs that can be used in the Medicare Resource-Based Relative Value Scale (RBRVS) practice expense methodology.

ACP believes that use of the new data can correct the inequities that stem from the outdated practice expense data and physician work hours data that CMS currently uses to calculate the “practice expense per hour” estimations for each specialty. Much of that data is from the 1995-1999 American Medical Association (AMA) Socioeconomic Monitoring System (SMS) survey. Since that time, the practice expense per hour data has been modified for certain specialties that have conducted supplemental surveys to collect more recent data, but not for all specialties. ACP believes that the multi-specialty survey data now available will enable CMS to update the physician practice data for all specialties and health professions simultaneously, based on the most recent data set. Additionally, the fact that the AMA shepherded the survey project helped to ensure participation that produced a data set that reflects current physician practice expenses. ACP commends the AMA, which was supported by the broad-based AMA/Specialty Society Relative Value Update Committee (RUC) and its Advisory Committee, for its leadership.

In conclusion, ACP strongly encourages CMS to immediately incorporate the new multi-specialty practice expense survey data into the RBRVS methodology that determines Medicare Physician Fee Schedule payments. Please contact Brett Baker, Director, Regulatory and Insurer Affairs, by phone at 202-261-4533 or by e-mail at bbaker@acponline.org if you need additional information.

Sincerely,

A handwritten signature in black ink, reading "Yul D. Ejnes, MD, FACP". The signature is written in a cursive style with a small "MD" and "FACP" at the end.

Yul D. Ejnes, MD, FACP
Chair, Medical Service Committee

cc: Whitney May CMS
Doug Leahy, MD ACP
Brett Baker ACP