

February 28, 2000

Nancy-Ann DeParle, Administrator
Health Care Financing Administration
Department of Health and Human Services
Hubert H. Humphrey Building, Room 443-G
200 Independence Avenue, SW
Washington, DC 20201

Attention: HCFA-1065-FC (Five Year Refinement)

Dear Ms. DeParle:

On behalf of the American College of Physicians-American Society of Internal Medicine (ACP-ASIM), the nation's largest medical specialty society representing more than 115,000 doctors of internal medicine and medical students, I am writing to comment on the Health Care Financing Administration's (HCFA) rule regarding the five year refinement of physician work values, published in the November 2, 1999 *Federal Register* (59,380).

ACP-ASIM concurs with the seven sources of change in physician work over time identified in the five year review of physician work relative value units (RVUs) contractor report developed by Health Economic Research (HER). The seven sources of change are as follows:

1. Technology diffusion
2. Learning-by-doing
3. Technology substitution
4. Personnel substitution
5. Re-engineering
6. Patient severity
7. Mandatory documentation

ACP-ASIM is particularly concerned with number seven, mandatory documentation. Clearly, the documentation guidelines requirements for evaluation and management (E/M) services is a source of increased physician work over the past five years. Previously, ACP-ASIM has asked HCFA to pilot test the use of documentation guidelines and as part of the pilot test to determine the amount of physician time and work involved with meeting the documentation requirements. ACP-ASIM urges HCFA to use the information from the pilot test to appropriately update the physician work RVUs for E/M services.

ACP-ASIM appreciates the opportunity to comment on the five year refinement of physician work values. If you have any questions about these comments, please contact ACP-ASIM's Director of Managed Care and Regulatory Affairs, John DuMoulin, at (202) 261-4535. Thank you.

Sincerely,

Cecil B. Wilson, MD, FACP
Chair, Medical Services Committee