

September 30, 1998

Jeffrey L. Kang, MD, MPH  
Director, Office of Clinical Standards and Quality  
Health Care Financing Administration  
7500 Security Boulevard  
Baltimore, MD 21244

Dear Doctor Kang:

The undersigned medical societies are writing to strongly urge the Health Care Financing Administration (HCFA) to extend the deadline for comments on HCFA's administrative coverage policy process for an additional 30-60 days. Background materials for Friday's Town Hall meeting were not distributed to attendees until Friday, September 18. Three weeks is not a sufficient period of time to develop meaningful comments. In fact, perhaps unintentionally, the extremely short comment period implies that HCFA may not be sincerely interested in receiving meaningful comments.

Beyond the written materials, a number of ideas for HCFA's administrative process were discussed for the first time at the Town Hall meeting. In response to the questions raised by HCFA staff before and during the meeting, attendees suggested several alternatives for consideration, such as having a smaller advisory committee, structuring the committee around clinical areas rather than benefit types, and dealing with the perception that a formal appeals process is necessary. Two weeks is simply not a long enough time to permit careful consideration of these alternatives and development of comments. Regardless of whether HCFA proceeds with plans to issue a final notice or decides to develop a proposed rule, it will be very difficult for organizations to provide the agency with the type of feedback that will be most useful to either process by mid-October.

We would appreciate your prompt and serious consideration of this request.

Sincerely,

American Academy of Dermatology  
American Academy of Orthopaedic Surgeons  
American Association of Clinical Endocrinologists  
American Association of Clinical Urologists  
American Association of Neurological Surgeons  
American College of Cardiology  
American College of Chest Physicians  
American College of Gastroenterology  
American College of Obstetricians & Gynecologists  
American College of Physicians-American Society of Internal Medicine  
American College of Rheumatology  
American College of Surgeons  
American Gastroenterological Association

American Lung Association  
American Medical Association  
American Medical Group Association  
American Psychiatric Association  
American Sleep Disorders Association  
American Society for Dermatologic Surgery  
American Society for Gastrointestinal Endoscopy  
American Society of Clinical Pathologists  
American Society of Cataract & Refractive Surgery  
American Society of General Surgeons  
American Society of Hematology  
American Thoracic Society  
American Urological Association  
College of American Pathologists  
Congress of Neurological Surgeons  
Medical Group Management Association  
Renal Physicians Association  
Society for Vascular Surgery  
Society of Nuclear Medicine  
Society of Thoracic Surgeons

CC: Nancy-Ann Min DeParle, Administrator  
Grant Bagley, MD, JD