

September 20, 2001

Thomas Scully
Administrator
Centers for Medicare and Medicaid Services
200 Independence Avenue SW
Washington, DC 20201

Dear Mr. Scully:

The medical organizations listed below would like to express our strong support for maintaining local carrier advisory committees (CAC) where they currently exist and assuring that there are carrier medical directors (CMD) for each state. CACs and CMDs are one of the few effective ways of communicating with the physician community.

We appreciate the Agency's renewed commitment to increase physician/provider outreach and believe that removing either the CACs or the CMDs would be extremely counterproductive to this effort. Unfortunately, the Centers for Medicare and Medicaid Services (CMS) already spends for physician education only a fraction of what is spent on enforcement activities. The General Accounting Office has already concluded that there are serious problems with the adequacy of physician education by CMS regarding its regulatory requirements and policies. Now we understand that the Agency's commitment to education and outreach provided by the CMDs and through the CAC process is being reassessed in light of budgetary pressures.

CACs provide one of the very few opportunities for the local medical profession to express its views about carrier administrative policies and coverage decisions. We hope that the new Administration will seek ways to make the CACs more effective and responsive to physician concerns rather than excluding this important opportunity for clinical input. In May of 1992, the HHS Secretary's Advisory Committee on Medicare – Physician Relationships issued eight specific recommendations, the first of which was to require each carrier to establish a physician advisory committee. This recommendation also proposed that the CACs focus on improving physician-carrier relations through physician input into policy decisions and better explanations of these decisions. Secretary Thompson's desire to build closer relationships with the physician/provider community is as right today as the first Bush Administration's Secretary Sullivan's decision was in 1992.

To assure greater consistency in carrier administration of the program it is essential that carriers rely on the professional/provider community's clinical input when establishing or changing local and national coverage and medical review policies. Without input from those delivering services to Medicare patients, there is greater likelihood that the profession may question a particular policy.

While CACs regularly meet with representatives of the local medical community four times a year, the CMD has normally been available on a daily basis for practicing physicians who want to speak peer-to-peer about Medicare coverage or payment policy. This local peer-to-peer connection with the Medicare contractor needs to be retained. A single CMD serving multiple

states undermines the effectiveness of the CMD and the purpose of establishing a local carrier medical director in each state. CMDs provide unique access to the local physician community that is difficult, if not impossible, to replace by contractor non-physician personnel. The enhanced communication provided by the CMD benefits both physicians and carriers.

We urge the Centers for Medicare and Medicaid Management to retain and support local CACs and Medical Directors. Both activities compliment and improve the extent of communication, education, and understanding about the complexities of the Medicare program. The possibility of Medicare contractor reform and consolidation only increases the need for Medicare to have a local presence in each state, whether or not claims processing and other carrier functions are performed in each state.

Sincerely,

Alaska State Medical Association
Arizona Medical Association
Arkansas Medical Society
California Medical Association
Connecticut State Medical Society
Florida Medical Association
Idaho Medical Association
Illinois State Medical Society
Indiana State Medical Association
Iowa Medical Society
Kansas Medical Society
Kentucky Medical Association
Maine Medical Association
MedChi, the Maryland State Medical Society
Medical Association of Georgia
Medical Association of the State of Alabama
Medical Society of Delaware
Medical Society of the District of Columbia
Medical Society of New Jersey
Medical Society of the State of New York
Medical Society of Virginia
Michigan State Medical Society
Minnesota Medical Association
Mississippi State Medical Association
Missouri State Medical Association
Montana Medical Association
Nebraska Medical Association
Nevada State Medical Association
New Hampshire Medical Society
New Mexico Medical Society
North Carolina Medical Society
North Dakota Medical Association
Ohio State Medical Association

Oklahoma State Medical Association
Oregon Medical Association
Pennsylvania Medical Society
Rhode Island Medical Society
South Carolina Medical Association
South Dakota State Medical Association
State Medical Society of Wisconsin
Tennessee Medical Association
Texas Medical Association
Utah Medical Association
Vermont Medical Society
Washington State Medical Association
West Virginia State Medical Association
Wyoming Medical Society

Alabama Academy of Ophthalmology
Alabama State Society of Anesthesiologists
American Academy of Allergy, Asthma and Immunology
American Academy of Child and Adolescent Psychiatry
American Academy of Facial Plastic and Reconstructive Surgeons
American Academy of Family Physicians
American Academy of Neurology
American Academy of Ophthalmology
American Academy of Otolaryngology - Head and Neck Surgery
American Academy of Otolaryngic Allergy
American Association for Thoracic Surgery
American Association of Clinical Endocrinologists
American Association of Neurological Surgeons
American Association of Orthopaedic Surgeons
American College of Allergy, Asthma and Immunology
American College of Cardiology
American College of Chest Physicians
American College of Emergency Physicians
American College of Nuclear Physicians
American College of Obstetricians and Gynecologists
American College of Osteopathic Surgeons
American College of Physicians-American Society of Internal Medicine
American College of Radiology
American College of Rheumatology
American College of Surgeons
American Gastroenterological Association
American Geriatrics Society
American Medical Association
American Osteopathic Association
American Psychiatric Association
American Society for Aesthetic Plastic Surgery

American Society for Gastrointestinal Endoscopy
American Society for Reproductive Medicine
American Society for Therapeutic Radiology and Oncology
American Society of Anesthesiologists
American Society of Cataract and Refractive Surgery
American Society of Clinical Oncology
American Society of Clinical Pathologists
American Society of General Surgeons
American Society of Hematology
American Thoracic Society
American Urological Association
Association of American Medical Colleges
California Academy of Ophthalmology
California Society of Anesthesiologists
College of American Pathologists
Congress of Neurological Surgeons
Connecticut Pain Society
Connecticut State Society of Anesthesiologists
Delaware Academy of Ophthalmology
Delaware Academy of Physical Medicine and Rehabilitation
Delaware Society of Clinical Oncology
Delaware Society of Orthopaedic Surgeons
Georgia Society of Anesthesiologists
Indiana Academy of Ophthalmology
Infectious Diseases Society of America
Joint Council of Allergy, Asthma and Immunology
Maine Society of Eye Physicians and Surgeons
Maryland Society of Eye Physicians and Surgeons
Medical Group Management Association
Minnesota Academy Ophthalmology
Mississippi Society of Anesthesiologists
Missouri Section, American College of Obstetricians and Gynecologists
Montana Academy of Ophthalmology
National Association for Medical Direction of Respiratory Care
Nebraska Academy of Eye Physicians and Surgeons
New Hampshire Pediatric Society
New Jersey Academy of Ophthalmology
New Jersey State Society of Anesthesiologists
New Mexico Ophthalmologic Society
North American Society of Pacing and Electrophysiology
North Carolina Society of Eye Physicians and Surgeons
Ohio Ophthalmological Society
Ohio Society of Anesthesiologists
Pennsylvania Academy of Ophthalmology
Renal Physicians Association
Society of Cardiovascular and Interventional Radiology

Society of Critical Care Medicine
Society of General Internal Medicine
Society of Nuclear Medicine
Society of Thoracic Surgeons
South Dakota Academy of Ophthalmology
Texas Society of Anesthesiologists
The Endocrine Society
Virginia Society of Ophthalmology
Washington State Society of Anesthesiologists
West Virginia Academy of Ophthalmology