May 19, 2000

Nancy-Ann Min DeParle, Administrator Health Care Financing Administration 314G Hubert H. Humphrey Building 200 Independence Avenue S.W. Washington, D.C. 20201

Dear Ms. DeParle:

The undersigned surgical and medical associations are writing you to express our profound concern at your March 8 announcement that your agency intends to implement by June its December 1997 proposal to eliminate its long-standing requirement that nonphysician anesthesia personnel be supervised by either the operating practitioner or an anesthesiologist.

We support the position of the American Society of Anesthesiologists and the Anesthesia Patient Safety Foundation that such a step should be considered only after the development and review of current scientific outcomes data. As we understand HCFA's position, you regard such an analysis as unnecessary. We believe Medicare beneficiaries deserve better, and for that reason, we support the principles of the Safe Seniors Assurance Study Act of 1999 (S. 818/H.R. 632) that would mandate such a study prior to action by HCFA.

We hope you will reconsider implementation of the proposed rule, and undertake an outcome study.

Sincerely,

Alaska State Medical Association American Academy of Family Physicians American Academy of Neurology American Academy of Ophthalmology American Academy of Otolarygology Head & Neck Surgery Foundation American Academy of Pediatrics American Academy of Physical Medicine & Rehabilitation American Academy of Sleep Medicine American Association for Thoracic Surgery American Association of Clinical Endocrinologists

American Society of Maxillofacial Surgeons American Association of Neurological Surgeons American Association of Orthopaedic Surgeons American College of Allergy, Asthma and Immunology American College of Cardiology American College of Emergency Physicians American College of Obstetricians and Gynecologists American College of Osteopathic Surgeons American College of Physicians-American Society of Internal Medicine American College of Preventive Medicine American College of Radiology American College of Surgeons American Medical Association American Pediatric Surgical Association American Roentgen Ray Society American Society for Gastrointestinal Endoscopy American Society of Cataract and Refractive Surgeons American Society of General Surgeons American Society of Ophthalmic Plastic and Reconstructive Surgery American Urological Association Arizona Medical Association Arkansas Medical Society California Medical Association

Colorado Medical Society Connecticut State Medical Society Florida Medical Association Hawaii Medical Association Idaho Medical Association Illinois State Medical Society Indiana State Medical Association International College of Surgeons-United States Section Iowa Medical Society Kansas Medical Society Kentucky Medical Association Louisiana State Medical Society Maine Medical Association Massachusetts Medical Society MedChi-The Maryland State Medical Society Medical Association of Georgia Medical Association of the State of Alabama Medical Society of Delaware Medical Society of New Jersey Medical Society of the District of Columbia 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 Society** Pennsylvania Medical Society Puerto Rico Medical Association Rhode Island Medical Society Society of Critical Care Medicine Society of Thoracic Surgeons 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 Virgin Islands Medical Society Washington State Medical Association West Virginia State Medical Association Wyoming Medical Society