

December 29, 1999

Nancy-Ann Min DeParle, Administrator
Health Care Financing Administration
Department of Health and Human Services
Attention: HCFA-4000-FC
P.O. Box 26688
Baltimore, Maryland 21207-0488

Re: HCFA-4000-FC; RIN 0938-AJ30; Medicare Program; Suggestion Program on Methods to Improve on Medicare Efficiency (*Federal Register*, Vol. 64, No. 227, November 26, 1999)

Dear Ms. DeParle:

The American College of Physicians-American Society of Internal Medicine (ACP-ASIM), representing over 115,000 physicians and medical students of internal medicine, appreciates the opportunity to comment on the Suggestion Program on Methods to Improve on Medicare Efficiency. We endorse the concept of a rewards program to encourage and acknowledge suggestions that improve Medicare efficiency; however, we are concerned that the Health Care Financing Administration (HCFA) has not identified how it will publicize this program to the medical provider and supplier communities, Medicare beneficiaries, and public at large, so that the largest possible audience can be reached.

As HCFA noted in the Background section of the above *Federal Register* notice: "the Congress recognized that the public at large, especially the beneficiaries, physicians, and suppliers actively involved in the delivery and utilization of Medicare health care services, may be in a position to suggest ideas that might contribute directly to improving Medicare program efficiency. By enacting section 203(c) of the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the Congress has required us to establish a program that **encourages** (emphasis added) individuals to submit suggestions on methods that might improve the efficiency of the Medicare program."

We have placed our emphasis on the word **encourages**. If HCFA establishes a suggestion program for Medicare, and then does not publicize it to audiences intended by Congress, we believe its existence will go largely unknown, undermining Congressional intent. Thus, we strongly urge HCFA to use any and all vehicles available to announce the program's existence and encourage individuals to submit suggestions. Among the vehicles we would suggest are: (1) Detailing the Medicare suggestion program in HCFA's "Medicare and You" manual mailed out to beneficiaries; (2) Enlisting the support of the American Association of Retired Persons (AARP) to get the message out on the Medicare suggestion program through its various publications and activities; (3) Putting the Medicare suggestion program on the agenda of one of HCFA's regular medical specialty conference calls; (4) Working with medical and supplier groups to publish details of the Medicare suggestion program in their association

journals/newsletters; (5) Placing fliers describing the Medicare suggestion program in medical offices, Social Security district offices, post offices, and other public places.

We hope that HCFA chooses to actively get the word out on its new Medicare suggestion program, and utilizes at least some of the above suggested vehicles to ensure that there is widespread awareness of the program amongst providers, suppliers, beneficiaries, and the public at large. Without such publicity, we fear the Medicare suggestion program will never achieve its Congressional intent, buried in the relative obscurity of a *Federal Register* notice.

On our part, ACP-ASIM is planning to make our membership aware of the Medicare suggestion program through our monthly publication, *The Observer*. We would also like to include in this article information on any measures HCFA will be taking to publicize the program to the target audiences identified by Congress, and would appreciate any details to this end.

Sincerely,

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