

February 28, 2012

Marilyn Tavenner Acting Administrator Centers for Medicare & Medicaid Services Department of Health & Human Services P.O. Box 8012 Baltimore, MD 21244-1850

Re: Access to Primary Care Incentive Program (PCIP) data

Dear Ms. Tavenner:

On behalf of the American Academy of Family Physicians (AAFP), which represents more than 100,300 family physicians and medical students nationwide, thank you for meeting with the AAFP leadership on February 13. During our meeting, we discussed our ongoing request for CMS to release aggregate data regarding the Primary Care Incentive Program (PCIP) and you suggested that information might be released in 2013. The AAFP urges CMS to reconsider this timeframe and instead share this useful data sooner.

Since the Affordable Care Act stipulates that PCIP incentives are distributed quarterly for certain services furnished on or after January 1, 2011 and before January 1, 2016, to date CMS has already issued four separate PCIP payments to qualifying primary care physicians and providers. But despite having over a year to compile and verify data from contractors, all official CMS data from the PCIP remains unavailable.

The AAFP believes that CMS is missing an important opportunity to showcase the PCIP. We urge CMS to continue highlighting the law's practical effect on primary care physicians by immediately releasing aggregate PCIP data. The agency already issues nearly monthly press releases containing impressive Affordable Care Act statistics showing Medicare beneficiary use of new preventive care services. CMS should include PCIP data in these or separate releases.

CMS should release PCIP data so that the AAFP and others can continue our work with policymakers as we strive to:

- Repeal the fatally flawed Medicare Sustainable Growth Rate (SGR) formula;
- Address the current payment discrepancies between primary care physicians and medical specialists:
- Properly value primary care services performed by primary care physicians.
- Better understand where primary care payments are distributed geographically, what amounts are being paid, and how primary care practices are reinvesting these incentives to improve patient care; and
- Highlight to medical students the favorable Affordable Care Act policies impacting primary care physician so they can make more informed decisions as the contemplate medical specialty careers.

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The AAFP continues to <u>support</u> the agency's implementation of the PCIP and appreciates the administrative improvements included in the final 2011 Medicare Physician fee schedule which significantly expanded the estimated number of eligible family physicians. But we remain concerned that only estimated PCIP impact analyses exist when actual payment data will make clear how well the PCIP is working.

We are available for questions you might have, or clarifications you may need. Please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or <a href="mailto:rbennett@aafp.org">rbennett@aafp.org</a>.

Sincerely,

Roland A. Goertz, MD, MBA, FAAFP

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**Board Chair**