

November 10, 2006

Ms. Leslie Norwalk
Administrator
Centers for Medicare & Medicaid Services
200 Independence Avenue NW, Room #314-G
Washington, DC 20201

Dear Administrator Norwalk:

The undersigned medical organizations are writing to express our strong concern about recent actions by the Centers for Medicare and Medicaid Services (CMS) to direct Medicare Quality Improvement Organizations (QIOs) to independently develop and/or facilitate physician performance measure development for the Physician Voluntary Reporting Program (PVRP). The current process of measure development by the Physician Consortium for Performance Improvement (Consortium), with endorsement by the National Quality Forum (NQF) and consensus approval by the AQA ensures that all stakeholders are involved. We are concerned that CMS is seeking to exert greater control over physician measure development by diminishing the role of the Consortium through this shift to the QIOs working independent of the existing process.

The Consortium has worked over the past six years to develop physician performance measures through a rigorous and transparent process that now involves over 100 national medical specialty and state medical societies, the Council of Medical Specialty Societies, American Board of Medical Specialties, as well as numerous other private and public sector organizations including CMS and the Agency for Healthcare Research and Quality. The Consortium's work has allowed CMS to significantly expand the measures available to the PVRP program through the dedicated work of practicing physician volunteers across the country. To date the Consortium has developed 130 measures and plans to finalize 20 additional measures on November 15th for a total of 150 measures. Work on new measures will continue at a rapid pace through 2007 and beyond.

The cross-specialty nature of the Consortium is critical to creating valid physician performance measures with broad based support in the physician community because it allows input from the multiple physician specialties who the treat different aspects of care often associated with a single disease. It allows physicians to come together to focus on what is best for patients as opposed to creating competing and potentially conflicting performance measures under 100+ independent specialty and sub-specialty silos. In no way can the Consortium be replicated through a development process created from scratch by CMS and the QIOs.

In the QIO 8th Statement of Work for 2005-2008, QIOs are specifically tasked with providing technical support to physicians, communicating with and educating physicians about CMS quality initiatives such as the PVRP, and assisting physicians with adoption of electronic health records. We support these QIO activities. Instead of attempting to replicate an established measure development process that includes virtually all physician

specialties, CMS should further direct its resources to allow QIOs to pursue these important complementary responsibilities. This will allow Medicine and the QIOs to work together in a collaborative fashion to help Medicare implement useful programs to assist physicians in providing the highest quality care to their patients.

Sincerely,

American Academy of Dermatology Association
American Academy of Facial, Plastic and Reconstructive Surgery
American Academy of Family Physicians
American Academy of Neurology
American Academy of Ophthalmology
American Academy of Otolaryngology-Head and Neck Surgery
American Academy of Physical Medicine and Rehabilitation
American Association of Clinical Endocrinologists
American Association of Clinical Urologists
American Association of Neurological Surgeons
American Association of Orthopaedic Surgeons
American College of Cardiology
American College of Chest Physicians
American College of Obstetricians and Gynecologists
American College of Osteopathic Surgeons
American College of Physicians
American College of Surgeons
American Gastroenterological Association
American Geriatrics Society
American Heart Association
American Medical Association
American Medical Directors Association
American Medical Group Association
American Osteopathic Academy of Orthopedics
American Osteopathic Association
American Rhinologic Society
American Society of Addiction Medicine
American Society of Anesthesiologists
American Society of Cataract and Refractive Surgery
American Society of Clinical Oncology
American Society of Plastic Surgeons
American Thoracic Society
American Urological Association
College of American Pathologists
Congress of Neurological Surgeons
Infectious Diseases Society of America
Medical Group Management Association
National Medical Association
Renal Physicians Association
Society for Vascular Surgery
Society of Critical Care Medicine

Society of Hospital Medicine
Society of Interventional Radiology
Society of Nuclear Medicine
Society of Thoracic Surgeons
The Endocrine Society