



## American Academy of Family Physicians

November 15, 2005

Mark B. McClellan, M.D., Ph.D.  
Administrator  
Centers for Medicare and Medicaid Services  
Washington, DC 20201

Dear Dr. McClellan:

I write to communicate the opposition of the American Academy of Family Physicians to the CMS Voluntary Physicians Reporting System announced on October 28, 2005. The program as outlined is ill conceived and poorly timed in relation to the deteriorating payment environment for family physicians.

A disproportionate burden of this program falls on the shoulders of primary care physicians whose services have been long undervalued by Medicare. Asking physicians to invest in new reporting systems, whether in a paper based office or one using electronic health records, in an environment of a potential 4.4% payment cut is unreasonable. The voluntary nature of this program does little to assuage the fears of our members that it will soon be attached to a pay for performance structure that is unlikely to compensate them for the additional burden that it imposes.

A number of high level CMS representatives have worked with the Academy and many other organizations on the Ambulatory Care Quality Alliance to craft a performance measures "starter set." It is very disappointing to find that CMS appears to have largely ignored the results of that effort and the principles followed in selecting the measures. The scope of the data collection burden from this plan without some financial consideration or incentive makes it nearly impossible for any physician to "volunteer."

We do have specific ideas on the construct of an integrated quality reporting and pay for performance system and how it should be funded. We would welcome the opportunity to meet with you and discuss our concerns and suggestions in more detail.

Sincerely,

Mary E. Frank, M.D., FAFAP  
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