



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

November 30, 2010

Donald Berwick, M.D.
Administrator
Centers for Medicare & Medicaid Services
7500 Security Boulevard, Baltimore
MD 21244-1850
Mail Stop S3-02-01
Sent via e-mail to physiciancompare@cms.hhs.gov

Attn: Physician Compare Town Hall Meeting Comments

Dear Dr. Berwick:

I am writing on behalf of the American Academy of Family Physicians (AAFP), which represents more than 94,700 family physicians and medical students nationwide. Specifically, I am writing to offer our comments on the agency's implementation of Section 10331 of the *Affordable Care Act (ACA)* which requires the Centers for Medicare & Medicaid Services (CMS) to establish, by January 1, 2011, a website known as "Physician Compare" that contains information on Medicare physicians and other eligible professionals who participate in the Physician Quality Reporting System (PQRS). As a longstanding advocate of quality improvement efforts, AAFP acknowledges the value and overall trend toward public performance reporting.

The Academy welcomes the agency's efforts to seek multi-stakeholder input and appreciates the Oct. 27, 2010, town hall meeting the agency held regarding the website's design. We offer the following comments and suggestion so that Medicare patients and their caregivers can benefit from online access to helpful and accurate information about Medicare physicians and other healthcare professionals. The Academy recognizes that Section 10331 also requires the agency to eventually include additional information, specifically physician performance data and PQRS measures reported. AAFP remains ready to assist the agency to continue to improve this website and to develop the Section 10331 required report to Congress due Jan. 15, 2015.

CMS currently publishes the [Healthcare Provider Directory](#) on [Medicare.gov](#). This website offers searchable information on physicians and other healthcare professionals by specialty, type of professional, location, gender, language(s) spoken, education, and hospital affiliation(s), as well as denoting their Medicare participation or non-participation status. In 2009, CMS posted information about 2008 PQRS participating physicians and announced intentions to eventually include information on the electronic prescribing program. Given the agency's existing efforts, the Academy concurs with CMS' proposal to comply with this ACA requirement by using the current Healthcare Provider Directory as the foundation for the Physician Compare website.

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AAFP believes online access to physician information is desirable and useful for Medicare beneficiaries, and we also believe the information must be current and accurate. CMS largely bases the current Healthcare Provider Directory directly on information garnered through the Provider Enrollment, Chain, and Ownership System (PECOS). Unfortunately, the currency and accuracy of PECOS is highly suspect in light of the well-documented instances of Medicare contractor delays associated with the Medicare enrollment process. We recognize that comments on the Medicare enrollment system largely fall outside the scope of this specific request for comments, but still encourage CMS to promptly and drastically improve the Medicare physician enrollment process given its direct connection to the development of a Physician Compare website.

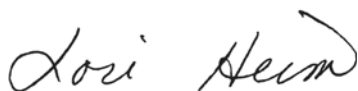
Given the clear importance of posting only accurate information online, we appreciate that the agency included a "Note to providers" web link on the current Healthcare Provider Directory. Providing instructions to physicians on how to review and, where necessary, obtain correction of their professional, contact, and eventually PQRS performance information is both helpful and essential. We encourage CMS to increase visibility of how to make corrections on this site as well as create educational materials designed specifically for physicians, so they can update and/or correct their online information. This process should not be cumbersome or time consuming.

Everyday, Medicare patients and their caregivers go online to learn details about Medicare benefits and identify potential providers. AAFP therefore urges CMS to update this website as frequently as is feasibly possible. Frequent, perhaps monthly, updates would improve access to care by quickly connecting newly enrolled physicians or recently established practice locations with prospective patients. Prompt updates also serve to hasten the removal of inaccurate information. Unfortunately, in the last year Congress allowed the Medicare physician payment cuts to temporarily go into effect. When this occurs, CMS typically allows physicians to reexamine their Medicare participation status. Frequent updates to the Healthcare Provider Directory are especially needed during these all-too-frequent lapses by Congress so that physicians' decisions in this regard are accurately reflected on the site.

Finally, as you know, ACA greatly improved coverage, starting in 2011, for annual wellness visits and removed several barriers to receiving preventive services and immunizations. We noticed educational links on the Healthcare Provider Directory website to "Staying Healthy! Talk with your doctor," "Spotlight on Getting the Most from Doctor's Visits," and other information for Medicare beneficiaries on preventive services. However, these educational documents did not reference the new ACA benefits that begin in just a few weeks. We therefore strongly encourage the agency to quickly update this website, so Medicare beneficiaries take full advantage of these important primary care services.

Thank you for this opportunity to comment on this matter. As noted earlier, we look forward to future opportunities to comment as the agency further develops the website to include additional physician performance and PQRS measures-reported information. If we may be of further assistance on this matter, please contact Robert Bennett at rbennett@aafp.org.

Sincerely,



Lori J. Heim, MD, FAAFP
Board Chair