



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

July 9, 2015

Andy Slavitt, Acting Administrator
Centers for Medicare & Medicaid Services
200 Independence Ave., SW
Washington, DC 20201

Dear Acting Administrator Slavitt,

On behalf of the American Academy of Family Physicians (AAFP), which represents 120,900 family physicians and medical students across the country, I write to express growing concerns with Meaningful Use audits. Family physicians who have implemented and fully use electronic health records (EHRs) in the spirit of the Meaningful Use program should have a reasonable expectation that the accompanying financial subsidy would help offset the implementation costs and associated initial decrease in practice productivity. The AAFP is concerned that auditors are causing undue hardship for family physicians with unreasonable and burdensome documentation requests which result in additional, significant expenses to be a meaningful user. On April 6, 2015, the AAFP sent a [letter](#) to the Centers for Medicare & Medicaid (CMS) referencing our increasing concerns with the Meaningful Use audit program and we have not yet received a response. After sending that letter, we have continued to hear from family physicians with complaints and concerns over the disruptive and unhelpful nature of the audit process. The AAFP has gathered detailed casework regarding problems family physicians have reported to us. These include:

- Long wait times between correspondences with the auditors;
- Lack of follow-up by the auditors;
- No defined end of the audit process;
- Extensive back and forth communications and prolonged nature of the audit process; and
- Large administrative burdens on providers and practices to comply with documentation requests.

In order for family physicians to better understand the value of Meaningful Use audits and to combat the growing concerns in our membership that they are being targeted, we request that the agency provide us with an answer to these questions and publicly release this information:

- What is the percentage of eligible professionals being audited?
- What is the pass/fail rate of audits?
- What are the details of the selection process for an audit?

We request immediate attention to these concerns and a meeting to further discuss Meaningful Use audit concerns. Please contact Steven E. Waldren, MD, MS, Director, Alliance for eHealth Innovation at 800-274-2237, extension 4100 or swaldren@aafp.org.

Sincerely,

Reid B. Blackwelder, MD, FAFPP
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