

September 15, 2009

Dear Representative [last name],

On behalf of the undersigned physician and health care provider organizations representing more than 650,000 members, we write to **express our strong support of the Centers for Medicare and Medicaid Services' (CMS) proposal to update the Practice Expense (PE) component of the Medicare physician fee schedule with data from the recently concluded Physician Practice Information Survey (PPIS)**. Our members nationwide provide treatment to Medicare beneficiaries for a wide array of debilitating, chronic and acute conditions.

We understand that you have been contacted recently by other specialty physician organizations about their opposition to this survey and proposed update. Although we know that physicians represented by those groups face payment cuts under the proposed update, we strongly disagree with the concerns these groups have raised over the survey and its data for the following reasons:

- Until the recent Physician Practice and Information Survey (PPIS) was conducted with more than 50 specialties, physicians' **practice expense values were based on data that is over ten years old**, collected in 1995-1999.
- Some specialty groups, including those who stand in opposition to the proposed rule, receive payment based on much more recent survey data that was collected by a limited number of groups a few years ago.
- **Most physicians and other health care professionals have been significantly disadvantaged for several years** because of this imbalance. MedPAC and the GAO have called for this data to be updated for all groups since 2004.
- The new PPI Survey polled all specialty groups, including non-physicians who were previously not represented and the few who received payment increases through their supplemental surveys.
- All specialty groups participated in the funding, design, testing and implementation of this most recent PPI Survey and were responsible for ensuring an adequate response from their members.

In addition to these concerns, it is important to note that **all physicians and other healthcare professionals face a 22% payment cut on January 1, 2010**. Although this devastating cut is unrelated to the CMS practice expense update, opposing groups are including it in their claims of reduced payment and against implementing the PPIS survey data. .

The use of the new PPIS data will improve payment accuracy and correct significant inequities, which are goals shared by Congress, CMS, MedPAC, and the Administration. We support this objective and support the CMS proposal that will uniformly, fairly, and accurately update Medicare practice expense (PE) payments.

Sincerely,

American Academy of Dermatology
American Academy of Family Physicians
American Academy of Neurology
American Academy of Neurological Surgeons
American Academy Ophthalmology

American Association of Orthopaedic Surgeons
American Academy of Otolaryngology-Head and Neck Surgery
American Association of Neurological Surgeons
American College of Emergency Physicians
American College of Surgeons
American College of Obstetricians and Gynecologists
American Optometric Association
American Occupational Therapy Association
American Physical Therapy Association
American Society of Anesthesiologists
American Society of Plastic Surgeons
American Society of Refractive and Cataract Surgery
Congress of Neurological Surgeons
Infectious Diseases Society of America
North American Spine Society