

September 6, 2022

Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1770-P
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

RE: Practice Expense Data Collection and Methodology

Dear Administrator Brooks-LaSure:

The 2023 Medicare Physician Fee Schedule, released on July 7, 2022, requested feedback from stakeholders regarding the design, sampling, and fielding of a potential future practice expense (PE) survey. The data from such a survey could be used to estimate indirect practice costs and impact indirect PE valuation.

The undersigned organizations, representing a broad range of physicians and health professionals, wish to share our collective thoughts on the basic requirements necessary to generate an effective practice expense survey. Many of these same organizations previously participated in the American Medical Association's (AMA's) 2007/2008 Physician Practice Information Survey (PPIS). We are aware that the AMA is currently in the process of preparing a practice cost survey, anticipated to be released in 2023 to their members. We ask that the Centers for Medicare and Medicaid Services (CMS) allow the AMA time to complete their survey, and we are working with the AMA to provide input on that process. We also request that CMS provide clear criteria on how the agency will assess the survey instrument, sampling frame, and process employed to evaluate data from this survey. We ask that CMS provide a clear roadmap with multiple opportunities for stakeholders to provide feedback on the data collection process, review of the collected data, and consideration of whether it will be employed in future rate setting.

Transparency is a key factor in garnering support from the medical specialties for which the data will be collected. It is imperative that stakeholders are involved from the beginning and have opportunities for input throughout the survey process. Any guidelines related to data collection and data analysis, such as criteria and quality standards, should be clearly outlined. In addition to transparency, this will allow specialties and also non-AMA groups who bill Medicare, such as independent diagnostic testing facilities, dietitians, and psychologists, to conduct their own surveys by following the same parameters. The collected data, especially those responses that will be used, should contain a robust number of responses from each involved specialty to be considered statistically valid. Education should also be provided about the goal of the survey, the rollout process, and the data analysis methodology.

Thorough review and consideration of survey questions is also important in the effort to collect accurate and representative data. Terminology should be clearly defined, and all questions should be purposeful and meaningful to achieve the goal of collecting practice cost information for a variety of specialties with varying practice patterns, while keeping in mind that survey fatigue is real. Considerations should also be made for questions related to the impact of new technologies, such as electronic health records or artificial intelligence software.

In order to collect accurate data for each specialty, practice managers and/or financial experts for each practice should be engaged or involved in the survey completion process. Different specialties have different practice structures and practice costs that will need to be appropriately captured and translated into the survey instrument; this type of information is not something that a typical physician member would know or be able to quickly access.

We appreciate the opportunity to provide input on this important effort and hope for continued engagement with CMS in this process. If you have any questions or comments related to this letter, please contact Stephanie Le at sle@acr.org.

Respectfully Submitted,

Academy of Nutrition and Dietetics
American College of Cardiology
American College of Chest Physicians
American College of Radiology
American Psychological Association Services, Inc
American Society for Radiation Oncology
American Society of Neuroradiology
American Society of Nuclear Cardiology
American Thoracic Society
Society for Vascular Surgery
Society of Interventional Radiology
Society of Nuclear Medicine & Molecular Imaging

cc: Carol Blackford, CMS
Ryan Howe, CMS
Gift Tee, CMS
Michael Soracoe, CMS
Molly MacHarris, CMS