



July 3, 2018

Seema Verma  
Administrator  
Centers for Medicare and Medicaid Services (CMS)  
U.S. Department of Health and Human Services  
Room 445–G, Hubert H. Humphrey Building  
200 Independence Avenue SW  
Washington, DC 20201  
Via Email: [Seema.Verma@cms.hhs.gov](mailto:Seema.Verma@cms.hhs.gov)

Dear Administrator Verma,

On behalf of the American College of Physicians (ACP), thank you for the opportunity to meet with you in person to discuss our shared goals around reducing clinician burden and putting patients first. The College is the largest medical specialty organization and the second-largest physician group in the United States. ACP members include 152,000 internal medicine physicians (internists), related subspecialists, and medical students. Internal medicine physicians are specialists who apply scientific knowledge and clinical expertise to the diagnosis, treatment, and compassionate care of adults across the spectrum from health to complex illness.

The College applauds CMS for their commitment to the Patients Over Paperwork initiative and their ongoing engagement with stakeholders to collect specific information to understand better the burdensome issues physicians face on a regular basis. During our meeting, we discussed the need to reform current Evaluation and Management (E/M) documentation guidelines. I appreciate your question for additional details. For this, please note ACP's recent recommendations<sup>1,2</sup> for both short- and long-term approaches to addressing burdensome and unnecessary clinical documentation requirements. The documentation requirements for billing and auditing purposes are not in line with current medical practice, and we believe CMS is integral to fixing these issues. With input from key stakeholders, CMS can lead the charge in overhauling documentation requirements to focus on succinct, history-rich clinical notes that reflect the clinically-relevant information from the patient encounter. Health Information Technology (health IT) can then facilitate these documentation goals in the most efficient

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<sup>1</sup> [ACP Comments on 2018 PFS Proposed Rule \(pages 7-9\)](#)

<sup>2</sup> [ACP Recommendations for Patient Over Paperwork](#)

manner possible without losing the clinical narrative that supports and enhances the ongoing relationships between patients and their physicians.<sup>3</sup>

We also appreciate CMS' focus on interoperability and recently submitted comments<sup>4</sup> on the Inpatient Prospective Payment System (IPPS) Proposed Rule that outlined updates to what is now the Promoting Interoperability (PI) Program. While the updates in this rule are promising and appreciated, ACP still has some concerns with how the Agency intends to measure and promote interoperability. When moving forward with efforts to reduce clinician burden, it is important to recognize that a system in which an abundance of clinical information is consistently, securely, and electronically transferred does not fully address the burdensome issues clinicians face with their electronic health records (EHRs). Having access to every aspect of a patient's information does not respond to the need for clinicians to have the most useful and actionable information at the point of care. We look forward to seeing updates to the PI category within the Merit-Based Incentive Payment System (MIPS) in the coming week that we hope will similarly simplify the reporting on these measures and begin to address the need for interoperability to be truly practical and not exclusively focused on the unfiltered flow of data.

As part of ACP's own Patients Before Paperwork<sup>5</sup> initiative, we developed an administrative tasks data collection tool that captures specific examples of burdensome administrative tasks. We welcome the opportunity to continue to share with you and your staff the perspectives of our front-line physician members on the impact of unnecessary and excessive administrative tasks on them and their patients.

Thank you again. Please contact Shari M. Erickson, MPH, Vice President, Governmental Affairs and Medical Practice, by phone at 202-261-4551 or e-mail at [serickson@acponline.org](mailto:serickson@acponline.org) with questions or a request for additional information.

Sincerely,



Ana Maria Lopez, MD, MPH, FACP  
President  
American College of Physicians

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<sup>3</sup> Kuhn T, Basch P, Barr M, Yackel T, for the Medical Informatics Committee of the American College of Physicians. Clinical Documentation in the 21st Century: Executive Summary of a Policy Position Paper From the American College of Physicians. *Ann Intern Med.* 2015;162:301-303.

(<http://annals.org/aim/fullarticle/2089368/clinical-documentation-21st-century-executive-summary-policy-position-paper-from>)

<sup>4</sup> [ACP Comments on 2019 IPPS Proposed Rule](#)

<sup>5</sup> [ACP's Patients Before Paperwork website](#)