



March 26, 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

Dear Administrator Verma,

On behalf of the American College of Physicians (ACP), I want to express my thanks and support for your recent remarks at the Healthcare Information and Management Systems Society (HIMSS) 2018 Annual Conference. 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.

ACP greatly appreciates CMS' strong focus on reducing regulatory and administrative burden and addressing the need for more usable electronic health records (EHRs), reducing/simplifying reporting on use of health information technology (health IT), transparent and easily accessible healthcare data for clinicians and patients, and overhauling the Evaluation and Management (E/M) clinical documentation guidelines. The College recently provided some tangible [next steps](#) to help guide the implementation of CMS' Patients Over Paperwork initiative that are very much in line with your remarks at HIMSS 2018. Specifically, we outlined our recommendations for re-working the Advancing Care Information (ACI) category within the Merit-based Incentive Payment System (MIPS); streamlining and/or eliminating prior authorization requirements; and simplifying E/M documentation requirements.

The College has long advocated for reducing administrative tasks and putting patients first through our ongoing [Patients Before Paperwork](#) initiative. Administrative burdens lead to inefficient delivery of care to patients and are a major contributing factor to the burn-out epidemic among physicians. 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 as well as ACP's specific proposals to reduce documentation requirements, make the Quality Payment Program simpler and less burdensome, improve EHR functionality, and leverage health IT to simplify reporting. To this end, we would appreciate an opportunity to meet with you and your staff to engage in further discussion of these issues. Thank you again and 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 if you have questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Ende", with a long horizontal flourish extending to the right.

Jack Ende, MD, MACP
President
American College of Physicians