



Joseph J. Fifer, FHFMA, CPA
President and CEO
Healthcare Financial Management Association
3 Westbrook Corporate Center
Suite 600
Westchester, Illinois 60154

Dear Mr. Fifer:

The American College of Physicians (ACP) commends the Healthcare Financial Management Association (HFMA) for the recently released report developed by your Price Transparency Task Force titled "Price Transparency in Health Care" and endorses the report's guiding principles and recommendations. We agree that in this rapidly changing healthcare environment patients and all healthcare consumers have an "urgent need for meaningful and transparent price information."

The ACP is the largest medical specialty organization and the second-largest physician group in the United States. ACP members include 137,000 internal medicine physicians (internists), related subspecialists, and medical students committed to advancing the science and practice of medicine. 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 has extensive policy in support of transparency throughout the healthcare system. We believe that increased access to relevant healthcare information will promote quality, efficiency, and improve the ability of all healthcare consumers to make better, more-informed decisions. This policy is most clearly articulated in the 2010 policy paper "Healthcare Transparency --- Focus on Price and Clinical Performance Information" available at http://www.acponline.org/advocacy/current_policy_papers/transparency.pdf and it aligns quite well with the policies outlined by the Task Force.


While all your guiding principles are fully consistent with College policy, we particularly appreciate your recognition of the importance of:

- Linking price information to information on quality to help patients make an informed healthcare decision. Price should never be used as the sole criterion for choosing a physician or any other healthcare professional or service. Price should only be considered along with the explicit consideration of the quality of services delivered and/or the effectiveness of the intervention.
- Having participating organizations seek consensus regarding appropriate quality metrics. The current hodge-podge of quality metrics being used by the various public and private health plans leads to confusion among healthcare consumers and unnecessary administrative hassles for physicians and other healthcare professionals.

- Ensuring that price and other information provided to healthcare consumers is easily accessible and understandable. The transparent information made available must be comprehensible and useful to its intended audience and should include a clear statement of its limitations.

The College looks forward to potential future opportunities to work with you and other stakeholders towards the goal of promoting the increased transparency of meaningful and helpful information throughout the healthcare system.

Respectfully

A handwritten signature in black ink, reading "David A. Fleming, MD". The signature is written in a cursive style with a large, stylized "D" at the beginning and a small "MD" at the end.

David Fleming, MD, MA, FACP
President