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The Honorable Barack Obama
President of the United States
1600 Pennsylvania Avenue NW
Washington, DC 20500

February 3, 2015

Dear Mr. President:

On behalf of the Board of Directors of the American Medical Group Association (AMGA), I am writing to you concerning the Fiscal Year (FY) 2016 Budget of the United States Government and the restrictions it places on providing certain advanced imaging services. As you continue to work with Congress to determine how to best navigate the fiscal challenges facing our nation, we respectfully ask you to reconsider any proposals that would restrict the ability of multi-specialty medical groups and integrated health systems to coordinate the care of their patients by eliminating their ability to furnish advanced imaging services.

AMGA represents some of the country's largest, most prestigious integrated healthcare systems and multi-specialty medical groups. More than 160,000 physicians practicing within AMGA's member groups deliver healthcare services to more than 120 million patients, approximately one in three Americans.

Multi-specialty medical groups and integrated health systems invest in sophisticated information technology, care management processes, and teams of providers to coordinate high quality care. Prohibiting physicians practicing in multi-specialty medical groups from referring patients for advanced imaging services within their groups would have a devastating impact on some of this country's leading healthcare organizations, the patients they serve, and the integrated infrastructure that exists to deliver better healthcare at lower costs. Instituting such restrictions runs counter to the Administration's efforts to stimulate greater integration and care coordination in our healthcare system.

Patients who reside in rural or underserved areas would face additional hardship as a result of this proposal. If multi-specialty medical groups in these areas are prohibited from providing advanced imaging services within their four walls, patients will have to undergo the inconvenience of traveling much longer distances in order to receive necessary advanced imaging services. This delay could potentially result in missed diagnoses, or treatment of illnesses that if diagnosed earlier, would have better outcomes and be less costly to treat.

Multi-specialty medical groups utilize decision support tools to ensure that clinical decision-making is supported by evidence before ordering advanced imaging services. These groups have spent a great amount of time redesigning their internal processes, in collaboration with their group's radiologists, to ensure that such services are only furnished to patients when medically necessary.

We appreciate the Administration's exception to this restriction for practices that are "clinically integrated... and demonstrate cost containment," however, that term is undefined and coming to consensus on such a definition is problematic at best.

We do not believe that the Administration intends to prohibit some of the country's finest multi-specialty medical groups from providing necessary services to their patients. However, that will be the effect of this provision. We respectfully request then, that any budget proposal moving forward will preserve the ability of multi-specialty medical groups and health systems to provide advanced imaging services.

Thank you, Mr. President, for taking our comments into consideration. As always, our members and I stand ready to work with you on this important healthcare issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald W. Fisher". The signature is fluid and cursive, with a large initial "D" and "F".

Donald W. Fisher, Ph.D.
President and CEO
American Medical Group Association

Cc: The Honorable Sylvia Mathews Burwell, Secretary, Department of Health and Human Services