



American Medical Group Association

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amga.org

The Best Medicine *in* America.
The Best Medicine *for* America.

February 9, 2016

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

Dear Mr. President,

On behalf of the American Medical Group Association (AMGA), I am writing to you concerning the Fiscal Year (FY) 2017 Budget of the United States Government and the restrictions it places on providing certain advanced diagnostic imaging services. AMGA represents some of the country's largest integrated healthcare delivery systems and multi-specialty medical groups. More than 177,000 physicians practicing within AMGA member organizations provide healthcare services to 133 million patients, more than one in three Americans. As you attempt to address 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 health systems to coordinate the care of their patients by eliminating their ability to furnish advanced diagnostic imaging services.

This budget proposal includes a policy that would eliminate advanced diagnostic imaging services from the in-office ancillary services (IOAS) exception within the Stark physician self-referral law. Currently, this IOAS exception permits multi-specialty medical groups and integrated healthcare delivery systems to deliver high-quality, advanced diagnostic imaging services to their patients. Removing this exception would force patients to receive these services outside of their usual healthcare system. These patients also would lose the advantages inherent in receiving care in a medical group setting. These advantages include: use of a uniform medical record contained in an electronic medical record system; care management protocols incorporating evidence-based medicine; and receiving care from a team of providers that interact and collaborate with each other in formulating a plan that will best serve the patient. AMGA member medical groups devote significant resources to determine the proper use of advanced diagnostic imaging services, including utilizing decision support tools to ensure that clinical decision-making is supported by evidence before ordering advanced diagnostic imaging for their patients.

Narrowing the scope of the IOAS exception would negatively impact the ability of high-quality providers to coordinate and manage the care of their patients. At a time when the federal government is providing incentives for healthcare providers to integrate healthcare delivery, such as in Medicare Accountable Care

Organizations, narrowing or eliminating the IOAS exception runs counter to the intent of the Administration to foster greater integration and care coordination in the healthcare delivery system. In fact, recent pronouncements by the U.S. Department of Health and Human Services on tying 90 percent of Medicare payments to value by 2018 will be difficult to achieve if providers cannot integrate their care delivery processes, which includes coordinating advanced imaging services.

Patients who live in rural or underserved areas especially would face problems accessing imaging services if the IOAS exception is repealed. These patients would experience the inconvenience of traveling long distances to receive these services if they could not obtain them in their accustomed multi-specialty medical group setting. In certain cases, patients would face additional travel time or may forego or delay receiving these imaging services, resulting in a missed or delayed diagnosis. Such a lapse in care could result in worse outcomes and greater costs.

We appreciate that the Administration proposed an exception for practices that are “clinically integrated.” However, defining what is “clinically integrated” in the regulatory process is complex and time consuming. Consequently, we continue to oppose any restrictions on the ability to provide imaging services in the multi-specialty medical group setting.

We appreciate the Administration’s efforts to address our nation’s current fiscal condition and we request that the IOAS exception is preserved so that our members can continue to provide the very best care to their patients.

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".

Donald W. Fisher, PhD, CAE
President and CEO
American Medical Group Association

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