January 23, 2013

The Honorable Harry Reid
Senate Majority Leader
United States Senate
Washington, DC 20510

The Honorable Mitch McConnell
Senate Minority Leader
United States Senate
Washington, DC 20510

The Honorable John Boehner
Speaker of the House
U.S. House of Representatives
Washington, DC 20515

The Honorable Nancy Pelosi
Minority Leader
U.S. House of Representatives
Washington, DC 20515

Dear Mr. Reid, Mr. McConnell, Mr. Boehner, and Ms. Pelosi:

On behalf of the Board of Directors of the American Medical Group Association (AMGA), I am writing to you concerning advanced diagnostic imaging services. As Congress considers how best to address urgent legislative issues in the weeks ahead, the undersigned AMGA member groups, representative of the larger membership, respectfully ask you to oppose any legislation that would restrict the ability of multi-specialty medical groups and other organized systems of care to coordinate the care of their patients by eliminating their ability to furnish advanced diagnostic imaging services.

As you may know, AMGA represents multi-specialty medical groups and other organized systems of care, including some of the nation’s largest, most prestigious integrated health care delivery systems. More specifically, AMGA represents 430 medical groups that employ nearly 130,000 physicians who annually treat more than 130 million patients in 49 states.

AMGA members are committed to delivering efficient, high-quality, patient-centered care to their patients at the right time. Many AMGA members utilize decision support tools to ensure that clinical decision-making is supported by evidence before ordering advanced diagnostic imaging services. AMGA medical groups have spent enormous amounts of time redesigning internal processes, in collaboration with their group’s radiologists, to ensure that these services are furnished to patients only when medically necessary.

We have a vested interest in ensuring the highest of ethical standards in provider conduct and are devoted to being good stewards of taxpayer dollars. However, we are concerned about actual and conceptual legislative proposals that are being discussed on Capitol Hill related to advanced diagnostic imaging services, once again. Many of these proposals are transparent attempts to
channel resources to certain markets and will negatively impact some of the nation’s most well-respected health care institutions and the patients that they serve.

At a time when the federal government is providing incentives for health care providers to integrate care delivery, such as the Medicare Shared Savings Program, these legislative proposals would run counter to Congressional intent to stimulate greater integration and care coordination. Patients who live in rural or underserved areas especially would experience access problems in short order, and face the inconvenience of long travel distances to obtain necessary advanced diagnostic imaging services. Patients could be harmed due to increased inconvenience in obtaining advanced diagnostic imaging services which could result in missed diagnoses, or treatment of illnesses that if diagnosed earlier, would have better outcomes and be less costly to treat.

We recognize that some iterations of legislation concerning advanced diagnostic imaging have attempted to carve out multi-specialty medical groups. However, we are seriously concerned that these exceptions fail to provide multi-specialty medical groups and other organized systems of care with adequate protections that will truly preserve their ability to provide advance diagnostic imaging services.

We understand our nation’s fiscal condition, and the pressing budgetary issues before us. We also appreciate efforts to curb waste, fraud, and abuse. However, it is our hope that any legislation concerning advanced diagnostic imaging will preserve the ability of multi-specialty medical groups and other organized systems of care to provide advanced diagnostic imaging services.

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

Sincerely,

Donald W. Fisher, Ph.D.
President and CEO