

Instructions for Sending Comments to CMS on the 2010 Proposed Physician Fee Schedule

DATES: To be assured consideration, comments must be received at one of the addresses provided below no later than 5p.m. (Eastern Time) on Monday, August 31, 2009.

ADDRESSES: In commenting, please refer to file code CMS-1413-P. CMS does not accept comments by facsimile. You may submit comments in one of two ways:

1. Electronically: You may submit electronic comments on the regulation to <http://www.regulations.gov/serach/index.jsp> Follow the instructions under the “More Search Options” tab.
2. By express or overnight mail: You may send written comments to the following address ONLY:
Centers for Medicare & Medicaid Services,
Department of Health and Human Services,
Attention: CMS-1413-P,
Mail Stop C4-26-05,
7500 Security Boulevard,
Baltimore, MD 21244-1850

Talking Points and Form Letters

We are asking ALL ACC MEMBERS to write to CMS, urging the agency to stop these reductions. We strongly suggest that you send a letter in your own words and provide detail on your practice expenses in that letter. In your correspondence, please include the following:

- Introduce yourself as an interventional cardiologist and provide the location of the practice where you work.
- Tell CMS that Medicare payments for invasive and interventional cardiology procedures have already been reduced significantly.
- Stress that, despite what the AMA survey suggested, your practice expenses have not declined by 33% since 2003 (presuming this is the case) and provide examples from your own practice.
- Ask why almost half of the AMA survey responses were thrown out and why 55 responses is being considered a valid representation of all of cardiology.
- Point out that the survey data currently used to derive rates have passed stringent statistical tests regarding reliability and representativeness.
- Emphasize that the proposed cuts for 2010 will directly affect the quality of care you can render to Medicare beneficiaries because the cuts will require reduced staff sizes, limit your ability to maintain and upgrade equipment, and otherwise negatively impact your practice.

While a form letter is preferred, personalizing and sending the following form letter would be helpful.