



December 16, 2009

The Honorable Arlen Specter
U.S. Senate
711 Hart Building
Washington, DC 20510

**Association of
American Medical Colleges**
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Dear Senator Specter,

On behalf of the Association of American Medical Colleges (AAMC), I write to thank you for offering Senate Amendment 3163. We strongly support your amendment which would delay for one year the implementation of the Centers for Medicare and Medicaid's (CMS) regulation. This would eliminate consultation codes except for telehealth services. Without the delay, CMS, its contractors and physician practices have less than a month to implement major changes in the way Medicare requires physicians to code for consultation services. There are many issues CMS must address before this change is implemented including revisions to the physician billing systems to accommodate the ongoing changes. A delay is necessary to avoid disruption for patients and inappropriate rejection of physician claims.

As you know, despite receiving numerous comments opposing the elimination of consultation codes, CMS finalized the proposal in the 2010 Medicare Physician Fee Schedule Final Regulation. The result is that beginning January 1, 2010, physicians who perform consultations will now code these services differently and will be paid significantly less money for the same work they were doing prior to implementation.

Medical school faculty physician practices provide a disproportionate share of the specialty and subspecialty professionals for many communities. Many of the consultations are performed by these physicians and require medically complex decision-making. These consultations are requested when the primary physician needs an additional opinion and/or specialized knowledge and expertise. The elimination of the current, separate codes for consultation services will have a disproportionate impact on academic physicians and the institutions in which they work. Academic medical centers are often safety net providers for the under-insured and uninsured. Asking them to bear the additional costs in consultation services without appropriate reimbursement will further stretch this critical community resource and could reduce access to Medicare beneficiaries.

The Association of American Medical Colleges is a not-for-profit association representing all 131 accredited U.S. and 17 accredited Canadian medical schools; nearly 400 major teaching hospitals and health systems, including 68 Department of Veterans Affairs medical centers; and nearly 90 academic and scientific societies. Through these institutions and organizations, the AAMC represents 128,000 faculty members, 75,000 medical students, and 110,000 resident physicians.

Again, thank you for your support. Please feel free to contact me or Len Marquez, AAMC's Director of Government Relations, at 202-862-6281 if I can be of any assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Atul Grover", with a long horizontal stroke extending to the right.

Atul Grover, MD, PhD, FACP, FCCP

Chief Advocacy Officer, AAMC