



American
Association of
Neurological
Surgeons

5550 Meadowbrook Drive
Rolling Meadows, IL 60008

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member services: 888.566.AANS
phone: 847.378.0500
fax: 847.378.0600
web: www.AANS.org

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bergerm@neurosurg.ucsf.edu

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william.couldwell@hsc.utah.edu

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Marilyn B. Tavenner
Acting Administrator
Center for Medicare and Medicaid Services
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, Maryland 21244-1850

**Re: RFI Regarding Health Care Quality for Exchanges
[CMS-9962-NC]**

Dear Ms. Tavenner,

On behalf of the American Association of Neurological Surgeons (AANS), we are writing in response to CMS' request for information regarding the promotion of quality within health insurance exchanges. Neurosurgery is supportive of the agency's goal to allow consumers to compare insurance options based on cost and quality considerations, but in so doing, CMS must ensure uniform standards for quality programs across insurance marketplaces. Such standards would optimally include the designation of specialty society registries as fundamental tools for tracking and measuring health care quality.

Presently, individual health insurance plans and CMS have different quality improvement programs and standards with which physicians must comply. These programs generally produce little meaningful data. Furthermore, they have not yet been shown to demonstrably improve patient outcomes. Organized neurosurgery therefore believes that prospective, systematic tracking of practice patterns and patient outcomes is the most effective mechanism by which physicians, including neurosurgeons, can improve the quality, efficiency and ultimately, the value of care.

In that regard, the AANS, in cooperation with a broad coalition of other neurosurgical societies including the CNS, Society of Neurosurgical Surgeons (SNS), and American Board of Neurological Surgeons (ABNS), created the National Neurosurgery Quality and Outcomes Database (N²QOD). The N²QOD is a comprehensive patient care registry program that was formed with the aim of measuring the real-world safety and quality of neurosurgical and spine-surgery care. The N²QOD places a significant emphasis on patient reported outcomes, an essential quality factor that is not generally captured in the traditional medical record.

Comprehensive registry data can be used to develop specialty-specific quality and outcomes measures that will be more meaningful than current “check box” measures contained in PQRS, the Electronic Health Record (EHR) Meaningful Use incentive program and various private third-party payer efforts. The current “one-size-fits-all” approach does not promote meaningful quality improvement in neurosurgery. Specifically, relevant tools for measuring quality and outcomes can vary significantly between primary care and surgical specialties.

This “patient-centered” approach is also aligned with the priorities of groups such as the Patient-Centered Outcomes Research Institute (PCORI), the Agency for Healthcare Research and Quality (AHRQ) and Health and Human Services triple aim: care, health, and cost. Additionally, this emphasis reflects a wider trend in quality improvement (QI) science towards patient oriented outcomes measures and away from process based measures.

As an aside, to date, organized neurosurgery has not yet developed specialty-specific quality and outcomes measures for public-reporting programs such as the CMS Physician Quality Reporting System (PQRS). Primary deterrents to creating these measures have been the significant costs associated with measure development using prevalent methodologies and a lack of high-level data to support specific process measures in our specialty. We are, however, committed to improving neurosurgical quality and outcomes, as stated above, through the collection of clinical and other patient data through a registry mechanism, which we believe to be a more cost effective and clinically relevant approach to quality improvement.

In summary, the AANS fully supports all efforts to improve the quality, safety and value of neurosurgical the quality of care. Furthermore we share, along with other health care stakeholders, a sense of urgency and responsibility to meet the challenges of creating a sustainable health care system. We look forward to working with CMS to ensure that the quality requirements of the health care exchanges meet the needs of practicing neurosurgeons and the patients we serve. In the meantime, we invite you to visit the N²QOD website for more information at <http://bit.ly/TaPMWc>.

Sincerely,



Mitchel S. Berger, MD, President
American Association of Neurological Surgeons



Anthony L. Asher, MD, Director
National Neurosurgery Quality and
Outcomes Database

Staff Contact

Koryn Y. Rubin, Senior Manager for
Quality Improvement
AANS/CNS Washington Office
725 15th Street, NW, Suite 500
Washington, DC 20005
Phone: 202-446-2030
E-mail: krubin@neurosurgery.org