

AMERICAN ASSOCIATION OF
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Regina Chell
Office of Clinical Standards and Quality
Center for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244

Re: *Physician Compare* Website Inaccuracies

Dear Ms. Chell,

On behalf of the American Association of Neurological Surgeons (AANS) and Congress of Neurological Surgeons (CNS), we are reaching out to you to address ongoing issues with the Center for Medicare & Medicaid Services' (CMS) *Physician Compare* website. Neurosurgery is aware of CMS' efforts to make improvements to *Physician Compare*; however, the website is still flawed and misleading to beneficiaries. Data continues to be incorrect or information is missing. Difficulties with the website continue to be reported to organized neurosurgery from members across the country, so we urge CMS to address these problems to ensure that Medicare beneficiaries have access to accurate and helpful information.

Our primary concern with *Physician Compare* is that neurosurgery is not listed as a specialty on the drop down menu on the homepage and we ask CMS to make this change as soon as possible. Neurosurgeons are grouped with neurologists or listed as a subspecialty within neurology. A user would not know that they have the option to search for a neurosurgeon until they click on "neurologists" and then select the subcategory "surgery-neurological". This simply is not an accurate way to classify our specialty. This grouping is clinically inaccurate, inappropriate and does not help patients find a neurosurgeon when they need one. Providing neurosurgery with its own specialty designation is appropriate as neurosurgery is:

- 1) a specialty recognized by the American Board of Medical Specialties (ABMS), with its own Board – the American Board of Neurological Surgery;
- 2) a specialty recognized by the Accreditation Council of Graduate Medical Education (ACGME), with its own Residency Review Committee – the RRC for Neurosurgery;
- 3) a specialty recognized by CMS on the Medicare provider enrollment form; and
- 4) a specialty recognized by CMS in the Medicare Physician Fee Schedule -- specialty code designation number 14.

Clearly, neurosurgery merits its own designation, but at the very least we should be listed as "surgery" on the dropdown down menu and then as "surgery-neurological" in the surgical subcategory listings.

Our second concern involves the inaccuracy of physician data contained in the *Physician Compare* database. In regards to querying information, when we have performed a search on a

random sample of a few of our Medicare-participating members by specifying the town, state and last name, the site turns up “0” results. Only when their specific name is entered does their entry come up. As a result of this faulty search function, patients may never find out about some highly qualified neurosurgeons in their area.

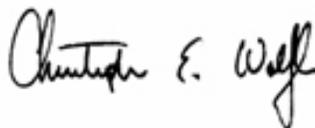
Another example points out the problems with the search function. One of our members searched for neurosurgeons in his immediate area and found that only one of his former partners, a **neurologist**, is listed under “surgery-neurological,” but none of his **neurosurgical** partners are listed – despite the fact that there are multiple neurosurgeons participating in Medicare in his town. A neurologist should not be categorized as “surgery-neurological” since they are two different specialties. Furthermore, a query which merely listed neurosurgeons a few hundred miles away demonstrates the obvious flaws with the current system. Both of these search outcomes are unacceptable and, once again, misleading to users.

Organized neurosurgery welcomes the opportunity to work with CMS to correct the flaws with *Physician Compare* and urges CMS to immediately change neurosurgery’s categorization. If you have any questions, please feel free to contact us. In the meantime, thank you for considering this important request.

Sincerely,



Paul C. McCormick, MD, MPH, President
American Association of Neurological Surgeons



Christopher E. Wolfla, MD, President
Congress of Neurological Surgeons

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