



Sound Policy. Quality Care.

July 20, 2015

Honorable Phil Roe, MD
407 Cannon House Office Building
Washington, DC 20515

RE: H.R.2653 - American Health Care Reform Act of 2015

Dear Representative Roe:

As the Alliance of Specialty Medicine (Alliance), our mission is to advocate for sound federal health care policy that fosters patient access to the highest quality specialty care. While we do not take a position on the American Health Care Reform Act of 2015 in its entirety, as patient and physician advocates, the Alliance supports Title V, Reforming Medical Liability Law. In addition, we support repeal of the Independent Payment Advisory Board (IPAB) and of the value-based modifier so that the physician community can work to identify measurable and meaningful quality metrics that improve patient care.

The Alliance firmly believes that comprehensive federal medical liability reform is long overdue. The unpredictability of the current system has led doctors to limit the scope of their practices, move to states that have effective reforms in place, or leave medical practice altogether. Without reform, patients' continued access to timely and necessary medical specialty care remains in jeopardy. While tort reforms such as those in place in California and Texas represent the "gold standard," we commend your efforts to explore other options, including a "safe harbor" for care provided in accordance with clinical guidelines.

The Affordable Care Act (ACA) mandated application of a value-based modifier (VBM) by 2015. Since enactment of the ACA, the Alliance has requested a delay in the implementation of the VBM to provide more time for the evaluation of measures and methodologies that are most appropriate for a range of practice sizes and types before more widespread implementation. In repealing the VBM, your legislation would create the opportunity to identify meaningful measures and methodologies along the lines of our key principles for quality improvement, including to:

- Incentivize meaningful quality improvement, rather than penalize arbitrary indicators of performance.
- Provide an appropriate timetable and make required investments in reforms.
- Give careful consideration to measures of resource use and value-based payments.
- Minimize regulatory burden.

In closing, the Alliance thanks you for your strong leadership in repealing the Independent Payment Advisory Board (IPAB) both in this legislation and in H.R. 1190, the Protecting Seniors' Access to

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American Academy of Facial Plastic and Reconstructive Surgery • American Association of Neurological Surgeons
American College of Mohs Surgery • American Gastroenterological Association • American Society for Dermatologic Surgery Association
American Society of Cataract & Refractive Surgery • American Society of Echocardiography • American Society of Plastic Surgeons
American Urological Association • Coalition of State Rheumatology Organizations • Congress of Neurological Surgeons
National Association of Spine Specialists • Society for Cardiovascular Angiography and Interventions • Society for Excellence in Eyecare

Medicare Act of 2015. The process and structure of the IPAB is fraught with potential unintended consequences and the IPAB lacks the clinical expertise and the research capacity to examine the national and regional effects of proposed recommendations to ensure patients are not unduly impacted. We were extremely pleased when the House passed its repeal of IPAB and we will continue to champion the companion legislation in the Senate.

Thank you for your leadership in developing the American Health Care Reform Act of 2015, which contains comprehensive medical liability reform and repeal of the IPAB and value based modifier. Please do not hesitate to reach out to us, should you require additional information.

Sincerely,

American Academy of Facial Plastic & Reconstructive Surgery
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