

August 30, 2011

Sound Physicians' commented on the CMS on the Proposed Rule "Medicare Program: Payment Policies under the Physicians Fee Schedule and Other Revisions to Part B for CY 2012" [CMS-1524-P]

See Proposed Rule <http://www.gpo.gov/fdsys/pkg/FR-2011-07-19/pdf/2011-16972.pdf>

Re: Physician Quality Reporting System

Sound Physicians is a national hospitalist organization with 80,000 annual Medicare submissions. Hospitalists are physicians who exclusively focus on delivering comprehensive Medicare care to hospitalized patients. In addition to managing the clinical problems of the acutely ill hospitalized patients, hospitalists partner with hospitals and the healthcare system to improve quality of care and efficient use of healthcare resources.

There are 30,000 US hospitalists exclusively focusing on delivering medical care to hospitalized patients and partnering with hospitals to improve quality of care and efficient use of healthcare resources. Sound Inpatient Physicians is a national hospitalist company with 80,000 annual Medicare admissions.

We have participated in PQRI in 2010 and 2011. We will be unable to participate in the 2012 PQRS initiative because the proposed PQRS core measures for internal medicine, family practice, general practice and cardiology are NOT applicable to hospitalized patients.

We suggest one of the following changes to the proposed rule for 2012 PQRS:

**Proposal 1:** Add existing PQRS measure No. 6 "Coronary Artery Disease (CAD) Oral Antiplatelet Therapy Prescribed for Patients with CAD" to the list of proposed 2012 PQRS core measures available for claims-based reporting. The measure is best aligned with CMS goal of promoting the prevention of cardiovascular conditions AND is applicable to hospitalized patients.

**Proposal 2:** Since none of the proposed 2012 PQRS core measures are applicable to hospitalized medical patients; exclude hospitalists from the list of specialties (i.e., internal medicine, family practice, general practice, and cardiology) required to report at least one proposed core measure. Instead, allow hospitalists to select at least three applicable measures from the proposed list of individual quality measures available for claims-based reporting.

**Proposal 3:** Designate Hospitalists as a specialty independent from Internal Medicine and develop a set of PQRS core measures that are applicable to inpatient care. After reviewing the list of proposed 2012 PQRS individual quality measures available for claims-based reporting we identified only six measures that can be applied to hospitalists. We would like to participate in developing a broader list of quality measures relevant to hospital medicine.

Thank you for your consideration.