

Date

Ms. Charlene Frizzera
Acting Administrator
Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
Attention: CMS-1413-P
P.O. Box 8013
Baltimore, MD 21244-8013.

Re: Medicare Program; Payment Policies Under the Physician Fee Schedule and Other Revisions to Part B for CY 2010. (CMS-1413-P)

Dear Ms. Frizzera:

Thank you for the opportunity to submit comments in response to the 2010 proposed physician fee schedule rule. As a physical therapist from (*insert your state, home town, and practice setting*), I strongly support the provisions in the proposed rule that would fully implement the Physician Practice Information Survey (PPIS) data in calculating practice expense relative value units. The use of this data will result in more accurate payments to physicians and other health care professionals who are paid under the physician fee schedule.

The current SMS data that CMS uses to calculate practice expense per hour costs for most specialties is out of date and therefore does not reflect current practice patterns. The Physician Practice Information Survey (PPIS) collected recent data from 51 specialties and is far more reflective of the current practice costs associated with furnishing services.

The organization that represents my specialty, the American Physical Therapy Association (APTA), was one of 72 groups who contributed funds to help finance a uniform and accurate practice expense survey. Because there was no SMS survey data available for physical therapist practices, as of 2002 CMS has used data from a supplemental practice expense survey that was conducted by APTA for physical therapists. We believe that CMS should use the new PPIS data rather than SMS data or supplemental survey data, because the practice expense survey used is more current and is consistent for all specialties. The AMA took great care to design and test the survey instrument, and to obtain review and feedback on the instrument from all the specialties.

The survey process was conducted in a highly scientific manner. It was conducted by external contractors using randomly selected samples from AMA's Physician Masterfile, or in the case of physical therapy, from APTA's membership database (consisting of members and non-members). In conducting the survey, strict criteria set forth by CMS for gathering and submission of this type of practice expense survey data were met. The Lewin Group independently corroborated the results and recommended that CMS use the data.

Clearly, the data from the PPIS survey are valid and the best available information on practice expenses for physicians and other health care professionals, such as physical therapists. It is essential that CMS use the most current and accurate data to calculate practice expenses, and therefore I strongly urge you to use the PPIS survey data in calculation of practice expense RVUs for 2010.

Thank you for consideration of these comments.

Sincerely,

Your name

Your Address