Physicians favor less documentation, oppose Medicare E/M pay proposal

Physicians and other health professionals welcome and strongly support the Centers for Medicare & Medicaid Services' "Patients Over Paperwork" initiative, and say three of its components need to be enacted immediately to reduce "note bloat" redundancy. But they oppose a proposal to collapse payment rates for physician office visit services over concern about unintended consequences.

Those were the key messages included in a letter to CMS Administrator Seema Verma from the AMA and about 170 other organizations representing physicians, health professionals, and health care stakeholders commenting on the proposed 2019 Medicare physician fee schedule and Quality Payment Program (QPP) rule.

The AMA and other organizations called for immediate adoption of these proposals:

- Changing required documentation of patient's history to focus only on the interval since the previous visit.
- Eliminating requirement for physicians to redocument information that has already been documented in the patient's record by practice staff or by the patient.
- Removing need to justify providing a home visit instead of an office visit.

However, the CMS proposal to "collapse" payment rates for five evaluation and management (E/M) office visit services into two has the potential to create unintended negative consequences for patients. "We oppose the implementation of this proposal because it could hurt physicians and other health care professionals in specialties that treat the sickest patients, as well as those who provide comprehensive primary care, ultimately jeopardizing patients' access to care," the letter states. The AMA and the other organizations joining the letter also oppose a proposed policy that would cut payments for multiple services delivered in the same day.

The organizations note their willingness to work with CMS to resolve issues connected with calculating the appropriate coding, payment and documentation requirements for different levels of E/M services. They also declare their support for the workgroup the AMA created of coding experts...
who would "arrive at concrete solutions" in time for CMS to implement in the 2020 Medicare physician fee schedule.

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