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April 22, 2011

Senator John D. Rockefeller, IV
Chairman

United States Senate

Committee on Commerce, Science, and Transportation
Washington, DC 20510-6125

RE: Consumers' Access to Diagnostic Heart Tests in Delaware Staff Report

Dear Senator Rockefeller:

The American College of Cardiology (ACC) appreciates the United States Senate Committee on Commerce, Science, and Transportation's diligence and dedication in investigating the pre-authorization practices of Blue Cross Blue Shield of Delaware (BCBSDE) and MedSolutions. The *Consumers' Access to Diagnostic Heart Tests in Delaware Staff Report* highlights several important concerns for cardiologists and medical providers including achieving appropriate level of diagnostic cardiac testing as well as minimizing the administrative burdens on medical practices to satisfy health plan requirements. We are in complete agreement with the report's findings on the burdensome nature of the RBM process, the conflicting guidelines between the medical specialty groups and MedSolutions, and the inappropriate ordering of cardiac stress tests.

As Dr. Ralph Brindis mentioned to you in his letter on May 11, 2010, one of the ACC's founding principles is to continually educate cardiovascular specialists on the most up-to-date evidence based and peer-reviewed medicine. As part of that education, the ACC developed Appropriate Use Criteria (AUC) to assist medical providers' decisions on which test may be appropriate for which patient. We believe these AUC documents have reduced inappropriate testing and improving appropriate ones, although we agree more must be accomplished to adequately address this issue. However, we also caution on the assumption that all testing can be directed purely by guidelines. While we can strive for improvement, attaining a zero rate of "inappropriate testing" is contrary to patient centered care where clinical acumen and physician judgment remain highly important.

Partnering with BCBSDE we are close to implementing FOCUS: Cardiovascular Imaging Strategies for all cardiology practices in Delaware. This program allows for transparent, AUC based and robust point-of-care decision support developed by ACC. The ordering physicians inputs patient clinical data and receives immediate results based on the ACC AUC. It engages providers in ongoing feedback reports and quality improvement activities. Through the work of a voluntary FOCUS community of over 300 imaging labs across the country, ACC has documented significant improvements in appropriate use over the past year.

The mission of the American College of Cardiology is to advocate for quality cardiovascular care — through education, research promotion, development and application of standards and guidelines — and to influence health care policy.

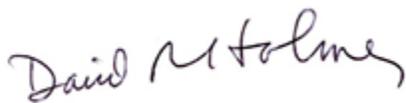
With this program, we hope to address the four major findings from your staff report:

1. A principle of the FOCUS program will be to determine the appropriateness for test requests and reduce only inappropriate use of advanced imaging services.
2. The FOCUS program aims to minimize daily provider hassles and burden by offering immediate online feedback within 30 to 90 seconds. By focusing on quality improvement the program changes a physician's habits, something RBMs and third party denials fail to accomplish.
3. The clinical logic for the FOCUS tool is taken directly from the ACC AUC without modification. Furthermore, FOCUS queries the patient's records for the results of recent testing that might obviate the need for the study in question. Again something an RBM doesn't accomplish.
4. Ultimately, the FOCUS program will not only show when individual cases are inappropriate, but will share the rates of appropriateness for ordering physicians, provide an assessment of the physician's need for clinical improvement, and share pathways for maintenance of certification training modules that address those needs.

Both BCBSDE and the ACC are excited to provide Delaware cardiologists this opportunity for clinical decision support based on the actual ACC AUCs as well as providing opportunities to exchange best practices and document action plans for quality improvement. In turn, providing improved quality care to those with heart disease in Delaware. The ACC is also in discussions with other health plans to bring this tool to more medical providers, including CMS and the Medicare population.

Thank you again for you and your Commerce Committee staff's attention to this important issue facing the American healthcare system. Please do not hesitate to contact Jack Lewin, M.D. at jlewin@acc.org or 202-375-6180 or James Fasules, M.D. at jfasules@acc.org or 202-375-6456 to follow up on these goals and suggestions. We will be sure to keep you informed as our AUC documents are updated and the FOCUS program enters more medical offices.

Sincerely,



David R. Holmes, Jr., M.D., F.A.C.C.
President
American College of Cardiology

Cc: Jack Lewin, M.D, ACC CEO
James Fasules, M.D., F.A.C.C., ACC SVP of Advocacy and Health Policy
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