



*Sound Policy. Quality Care.*

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July 22, 2009

The Honorable Henry Waxman  
Chairman  
House Committee on Energy and Commerce  
Washington, DC 20515

Dear Chairman Waxman:

As the Alliance of Specialty Medicine, our mission is to advocate for sound federal health care policy that fosters patient access to the highest quality specialty care and improves timely access to high quality medical care for all Americans. We are writing to express our strong opposition to your legislation, H.R. 2962, which we believe would undermine the patient-physician relationship and diminish the ability of physicians to ensure that their patients have access to the right care at the right time in the right setting.

Specialists that are experienced in diagnostic radiologic methods are fully competent to supervise the performance of and interpret imaging studies in their offices for the evaluation and management of certain conditions. Many specialists perform the immediate and timely interpretation of imaging studies, correlate these studies with clinical findings, and assume the responsibility for determining the treatment of their patients. The quality and accuracy of imaging studies and interpretations performed by these specialists are consistently high

Balancing quality patient care and the patient-physician relationship with concerns about utilization of imaging services is best accomplished by focusing on a combination of:

- o transparency of ownership interests;
- o disclosure of alternative providers;
- o the development of appropriateness criteria for imaging services;
- o and addressing liability reform in order to mitigate the circumstances that lead to the practice of defensive medicine.

The Alliance of Specialty Medicine has been supportive of these concepts and looks forward to all of the work to be done in this area- but to bluntly eliminate advanced imaging from the in-office ancillary exception is bad for patients and bad for quality care.

We, therefore, urge your reconsideration of this legislation.

Sincerely,  
American Association of Neurological Surgeons  
American Association of Orthopaedic Surgeons

American Gastroenterological Association  
American Society of Cataract and Refractive Surgery  
American Urological Association  
Coalition of State Rheumatology Organizations  
Congress of Neurological Surgeons  
Heart Rhythm Society  
National Association of Spine Specialists  
Society for Cardiovascular Angiography and Interventions

cc: House Ways and Means Committee chair  
House Energy and Commerce Committee chair