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February 16, 2007

Ms. Doris Lefkowitz  
Reports Clearance Officer  
Agency for Healthcare Research and Quality  
540 Gaither Road  
Room #5036  
Rockville, MD 20850

Re: Proposed Information Collection #4160-90-M

Dear Ms. Lefkowitz,

The American College of Cardiology (ACC) appreciates the opportunity to comment on the Agency for Healthcare Research and Quality's proposed information collection: "Evaluation of the Implementation and Impact of Pay-for-Quality (P4Q) Programs" (4160-90-M), as published in the Federal Register on January 16, 2007 (72 Fed. Reg. 1725). The ACC is a 34,000 member non-profit professional medical society and teaching institution whose mission is to advocate for quality cardiovascular care—through education, research promotion, development and application of standards and guidelines—and to influence health care policy. The College represents more than 90 percent of the cardiologists practicing in the United States.

The ACC strongly believes that rational, fair physician payment policies are a critical component of adequate access to care. We also support, in principle, the concept of rewarding high quality health care through P4Q programs that incorporate rational and fair payment policies. Our paramount goal in reviewing any proposed Pay-for-Quality initiative is to assure patient access to quality cardiovascular care.

Therefore, in the interest of assisting AHRQ in its development and evaluation of effective P4Q programs, the ACC respectfully submits these comments regarding the proposed information collection:

1. The overall design of the project, especially the small number of physician responders, may unintentionally limit this project's usefulness for broader application to health care delivery systems outside of the safety net setting;
2. Given the limited scope of the project, we are concerned that the efforts and findings will not add significant value to AHRQ's overall P4Q program efforts; and
3. As currently proposed, it is not clear if physician respondents and small practices in rural states are to be included. These constituents should be included in order to understand the implementation challenges and impacts of P4Q programs in such settings.

*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.*

The ACC thanks AHRQ for the opportunity to comment on this proposed information collection. The College is eager to assist in the development of any changes to this project, and welcomes the chance to work with AHRQ in its efforts to effectively implement and evaluate P4Q programs. Please feel free to contact Kathleen Flood, ACC's Director of Payer Advocacy at 202-375-6607 or by e-mail at [kflood@acc.org](mailto:kflood@acc.org) with any questions, or if we can be of additional assistance.

Sincerely,



Steven E. Nissen, M.D., F.A.C.C.  
President