



January 31, 2017

The Honorable Donald J. Trump
President of the United States
1600 Pennsylvania Avenue, NW
Washington, DC

Dear President Trump:

Throughout your successful campaign you spoke about the negative impact excessive regulation has on businesses. While many industries face heavy regulatory burdens, it is difficult to imagine any industry that is more regulated than the practice of medicine. And to this point, there is not a single discipline of medicine that faces greater administrative and regulatory burden than family physicians and other primary care physicians. In fact, research referenced in this letter shows that family physicians face a regulatory burden that is unmatched among the various medical disciplines. This burden ranges from onerous documentation guidelines to cumbersome prior-authorization criteria and the evergreen frustrations associated with electronic medical records.

The American Academy of Family Physicians (AAFP) represents 124,900 physicians and medical students nationwide and is the only medical society devoted solely to primary care. Family physicians conduct approximately one in five office visits. This represents more than 192 million visits annually, which is 48 percent greater than the next most visited medical specialty. Today, family physicians provide more care for America's underserved and rural populations than any other medical specialty. Mr. President, our members are at the frontline of care delivery and are the trusted partners that millions of people rely upon for health and wellbeing. Unfortunately, they are facing a regulatory environment that is distracting them from their core purpose and turning them into data clerks.

A 2016 study published in the *Annals of Internal Medicine* found that during a typical day, a primary care physician would spend 27 percent of their time on clinical activities and 49 percent on administrative activities. The authors of this study concluded that for every hour a primary care physician spends in direct patient care, they spend two hours engaged in administrative functions.

Without question, the most frustrating administrative activity in any primary care practice is the management of prior authorizations. The AAFP recently worked with other physician organizations to evaluate the impact of prior authorization on physician practices. This work found that the average physician practice completes 37 prior authorization requirements each week, per physician. This means a small group practice of 3 family physicians will complete more than 100 prior authorization requests – each week. Seventy-five percent of physicians in the survey indicated that their prior authorization burden was “high” or “extremely high” and nearly 90 percent said that prior authorization sometime, often, or always delayed patient access to care.

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Physicians have also grown frustrated with the onerous levels of documentation that must be completed for each patient. The current CMS Documentation Guidelines for Evaluation and Management (E/M) Services were written 20 years ago and do not reflect the current use and further potential of electronic health records (EHRs) and team based care to support clinical decision-making and patient-centeredness. The AAFP recommends that all documentation guidelines for E/M codes be eliminated for primary care physicians.

Prior authorizations and documentation guidelines are not the only sources of administrative burden. There are countless regulations that each physician must comply with on a daily basis in order to be compensated for the care they provide to their patients. While many of these regulations may be necessary, the depth and breadth of their application is not and they have consequences on patient care and the small businesses these physicians operate. Compliance with regulations and administrative requirements are not only time consuming, they are expensive. A March 2016 study published in *Health Affairs* found that primary care physicians spend 3.9 hours per week on reporting for quality programs. The same study estimated that the average annual cost of compliance with quality programs alone was \$40,069 per physician.

Compounding our members' frustration is the simple fact that many of these regulations contribute nothing to their efforts to provide high quality care to their patients. This, Mr. President, is why family physicians have grown so frustrated with the current administrative and regulatory requirements that are crushing physician practices, especially solo and small independent practices.

Consistent with your Executive Order issued on January 30, 2017, the AAFP has developed and is proposing a set of regulatory and administrative reforms that we believe would improve the practice of medicine and preserve independent primary care practices that are so important to our health care system and thousands of communities. We would welcome the opportunity to further discuss our ideas and policy proposals that are aimed at liberating physicians from the time and economic constraints of regulations, thus allowing them to devote more of their time and energy to their true calling – caring for patients. Please contact R. Shawn Martin, Senior Vice President of Advocacy, Practice Advancement, & Policy at smartin@aafp.org or (202) 232.9033 for additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Meigs, Jr.', with a small 'ms' monogram at the end.

John Meigs, Jr., MD, FFAFP
President