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March 11, 2009

Shirl Ackerman-Ross
Centers for Medicare & Medicaid Services
Designated Federal Officer, Advisory Panel on APC Groups
Center for Medicare Management
Hospital & Ambulatory Policy Group
Division of Outpatient Care
7500 Security Boulevard
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Ref: [CMS-1411-N] Medicare Program; Request for Nominations to the Advisory Panel on APC Groups; 73 Federal Register 246; December 22, 2008.

Dear Ms. Ackerman-Ross:

On behalf of our more than 5,000 member hospitals, health systems and other health care organizations, and our 38,000 individual members, the American Hospital Association (AHA) would like to support the nominations of Lee H. Hilborne, MD, MPH; Kari S. Cornicelli, FHFMA, CPA and Wendy D. Resnick, FHFMA for membership on the Advisory Panel on Ambulatory Payment Classification (APC) Groups ("APC Panel").

Dr. Hilborne, who previously served on the APC Panel, is Board Certified in Anatomic Pathology, Clinical Pathology, and is a Diplomate in Laboratory Management. He is currently the medical advisor for medical coding and patient business services and medical director of care coordination at the University of California Los Angeles (UCLA). He is also professor of pathology and laboratory medicine at UCLA School of Medicine and the deputy director of global health with RAND in Santa Monica. At UCLA Healthcare, his areas of responsibility include hospital utilization, quality management, medical staff services, and other key medical system areas. He also works on a number of projects for the RAND Corporation addressing differential payments to physician offices, hospital outpatient departments and ambulatory surgery centers and adjustment of severity models to be used for Medicare inpatient services.



Dr. Hilborne served for eight years as the AHA's representative on the CPT Editorial Panel where he provided significant assistance evaluating requests for laboratory code changes to keep apace with the technological advancements in this area and is now a member of the CPT Assistant Editorial Panel. He is an active member of the Facility Evaluation and Management (E/M) Expert Panel convened by the AHA and the American Health Information Management Association. He has held numerous leadership positions with the American Society of Clinical Pathologists, the College of American Pathologists, and the University Health System Consortium. Given this experience, he is therefore intimately familiar with CPT and other HCPCS codes. He is well versed in ambulatory payments both through his previous work on the APC Panel and subsequent work with the Centers for Medicare & Medicaid Services (CMS) and Assistant Secretary for Planning and Evaluation (ASPE).

Given Dr. Hilborne's extensive clinical and technical expertise in hospital payment systems, hospital medical care delivery systems and coding and payment classification systems, we are pleased to support his nomination to the APC Panel.

The AHA also supports the nomination of Kari Cornicelli to the APC Panel. Ms. Cornicelli has served in numerous financial leadership positions over her 24 year career in healthcare, including her current position as vice president and chief financial officer at Sharp Grossmont Hospital. Sharp HealthCare is the largest healthcare provider in San Diego, the top integrated delivery system in California, and is nationally recognized in the industry with the Malcom Baldrige National Quality Award. In this capacity, her primary responsibilities encompass strategic planning; business development; financial planning; master site/space planning and hospital compliance.

In addition, Ms. Cornicelli has been active on both the state and national levels regarding healthcare financial issues, including serving on the national Healthcare Financial Management Association (HFMA) Board of Directors has participated in two invitational HFMA national leadership retreats for "Building a New Payment System." Additionally, she has participated on the state level with California Hospital Association on payment issues.

Ms. Cornicelli's leadership experience in a variety of hospital types, including public, private, not-for-profit, investor-owned, rural and urban, has given her a depth and breadth of expertise in health care finance, strategic planning and business development that we believe will serve the APC panel well. We are pleased to support her nomination.

We also support the nomination of Wendy Resnick to serve on the APC Panel. Since 1999, Ms. Resnick has served as the assistant to the senior vice president and chief financial officer at

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Shands HealthCare in Gainesville, Florida, a \$4 billion teaching hospital and healthcare system. In this capacity, she leads special projects for Shands including the implementation of reimbursement changes, such as the Medicare outpatient prospective payment system, analyses of new and existing services, expansion of facilities, and the analysis and conversion of two rural facilities to critical access hospitals. Previously, as Shands HealthCare's director of financial analysis, she was responsible for directing all financial analysis activities, including ensuring the provision, evaluation and interpretation of financial data for sound decision making, timely and accurate reporting, safeguarding of assets and client satisfaction.

Ms. Resnick is also involved with HFMA as an advanced member and fellow. Her work with the Florida Chapter of HFMA includes her current position as webmaster and her past experience as co-chair of Certification Committee. Given Ms. Resnick's diverse experience in healthcare financing, leadership, and public policy development, the AHA is happy to support her nomination to the APC Panel.

For all these reasons we strongly support the nominations of Dr. Hilborne, Ms. Cornicelli and Ms. Resnick to the APC Panel and believe that their knowledge and experience would be beneficial to CMS. These candidates are excited about the opportunity to participate on APC Panel in order to help shape the future payment system for outpatient services. We have attached their curricula vitae that outline their qualifications in greater detail.

If you have any questions, please contact me, Nelly Leon-Chisen, RHIA, director of coding and classification at (312) 422-3396 or Roslyne Schulman, senior associate director for policy, at (202) 626-2273.

Sincerely,

Rick Pollack
Executive Vice President

Attachments