



Texas Ambulatory
Surgery Center Society

The United Voice of the Texas ASC Industry

August 30, 2011

VIA ELECTRONIC SUBMISSION

Donald Berwick, MD, Administrator
Centers for Medicare and Medicaid Services
Department of Health and Human Services
Attention: CMS-1525-P
P.O. Box 8013
Baltimore, MD 21244-1850

Re: CMS-1525-P; Proposed ASC Quality Reporting Program

Dear Administrator Berwick:

On behalf of the more than 410 ambulatory surgery centers (ASCs) in Texas, the Texas Ambulatory Surgery Center Society (TASCS), I am writing in regards to the CMS proposal that would require ASCs to begin submitting quality data to the agency starting on January 1, 2012.

The industry is very concerned about the CMS proposal that would require ASCs to begin submitting quality data to the agency starting on January 1, 2012. It is our understanding that CMS will not finalize these requirements until November 2011. Though we have some experience in collecting quality data, we do not think this would allow us enough time to make the needed changes in our processes and systems.

We urge CMS to delay the start of required data submission until October 1, 2012 at the earliest. We also believe it would be prudent for the agency to allow ASCs to submit quality data on a trial basis prior to the start date to allow us the opportunity to test our systems and resolve any problems that may arise.

Thank you for your consideration.

Sincerely,

Bobby Hillert
Executive Director