



# AMERICAN COLLEGE *of* CARDIOLOGY

## Principles for Site Neutral Payment

The American College of Cardiology supports the following principles for Medicare payments that must guide any payment policy changes in this area:

- Changes to Medicare payment should not harm access to care and quality of care, especially for vulnerable patient populations.
- Medicare payments should reflect the resources required to provide patient care in each setting—physician office, hospital outpatient, hospital inpatient. The “correct” payment may be different in different settings.
- Any payment differences across sites should be related to documented differences in the resources needed to ensure patient access and high quality care. Some limits on payment differentials for the same service provided in different settings may be reasonable.
- Medicare payments for all sites of care should account for costs related to emergency capacity, compliance with regulatory requirements, geographic differences, quality improvement activities and higher need populations.
- Proposals to make significant changes to Medicare’s payment systems (e.g., site neutral payment proposals) should be carefully aligned with other rapid changes in healthcare, including the movement to value-based purchasing and alternative payment systems. Major changes should be implemented gradually to minimize any negative impacts on patient access and quality.