

As the Managing Director of Clinical Care Options, a medical education company that creates only CME certified programs, read and used extensively around the world, I am extremely distressed about the impact the proposed CMS changes to the current CME exclusion will make on our industry.

Physicians here in the US depend on CME activities to keep current on the rapidly changing science and how to appropriately apply new therapeutic options and the results of clinical trials.

Our support over the past twelve years has come primarily from pharmaceutical and biotech companies and thanks to that support our company and one other has been responsible for the overwhelming proportion of technical and digital innovation in online CME programs. These online activities now accounts for the majority of CME courses and critical reference material used at the point of care that is available to physicians for no cost.

Thanks to this funding we have also been able to take our technology to Africa and with USAID grants we have been able to finally and fundamentally change how African clinicians are receiving education and information resources, simultaneously online and offline, to support their fight against AIDS, TB, malaria and other diseases that ravage their populations.

Changing the reporting requirements will have a devastating effect on continued funding by commercial supporters as well as a reticence on the part of physicians to participate out of fear that they will end up on a public online database that challenges their integrity and proclaims that they have taken pharmaceutical money for participating in an educational program that is, in fact, authored by the experts, peer reviewed and free of commercial bias. This makes absolutely no sense.

I implore the CMS to do what is right and necessary to continue the ability of companies like mine to continue to innovate technology, delivery systems and personalization to enhance and strengthen the incredibly busy physician's ability to get the information and self-directed study that they need anywhere, any time and on any platform they have available (laptop, tablet or smartphone).

I urge you to NOT fix something that is NOT broken.

Thank you for taking the time to consider my input into your process.

Respectfully