



# Pan American Allergy Society

September 2, 2014

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**ANNUAL MEETINGS**  
2015: March 19-22  
2016: March 17-20  
2017: March 16-19  
J.W. Marriott, Houston, TX

The Honorable Marilyn Tavenner  
Administrator  
Centers for Medicare & Medicaid Services  
Department of Health and Human Services  
Attention: CMS-1612-P, Mail Stop C4-26-05  
7500 Security Boulevard  
Baltimore, MD 21244-1850

Dear Administrator Tavenner:

The Pan American Allergy Society has been accredited by the Accreditation Council for Continuing Medical Education since 1988 and has strictly complied with ACCME® *Standards for Commercial Support: Standards to Ensure Independence in CME Activities* to develop continuing medical education independent of commercial interests. The Open Payments Program, if Section 403.904(g)(1) is rescinded, will duplicate rigorous processes and therefore put an unfair burden not only on the administration of the society but also each speaker who will now be compelled to fill out up to 64 fields of data.

Notwithstanding this, the Pan American Allergy Society (PAAS) believes that CMS should **not** rescind Section 403.904(g)(1) of the Open Payments program. We believe that CMS should retain the requirement that

"the applicable manufacturer does not pay the covered recipient speaker directly"

**and retain the requirement that**

"the applicable manufacturer does not select the covered recipient speaker or provide the third party (such as a continuing education vendor) with a distinct, identifiable set of individuals to be considered as speakers for the continuing education program."

As President of the Pan American Allergy Society, I strongly urge the CMS to exempt ACCME accredited providers from reporting within the CMS Open Payments Program.

Sincerely,

Diego Saporta, M.D.  
President

*"Committed to Excellence in Continuing Medical Education"*