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July 2, 2019

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**Re: June 24, 2019 Executive Order on Improving Price and Quality Transparency in American Healthcare to Put Patients First**

Dear Mr. President,

**SECRETARY/TREASURER**

Bruce R. Williams, DO, FACOFP  
Blue Springs, MO

The American College of Osteopathic Family Physicians (ACOFP) is the professional organization representing more than 20,000 practicing osteopathic family physicians, residents, and students throughout the United States who are deeply committed to advancing our nation's healthcare system by improving healthcare delivery and outcomes and ensuring that patients receive high-quality care.

**IMMEDIATE PAST PRESIDENT**

Duane G. Koehler, DO, FACOFP *dist.*  
Miami, OK

Thank you for the opportunity to share our statement in support of elements of the June 24, 2019 *Executive Order on Improving Price and Quality Transparency in American Healthcare to Put Patients First*, that would remove barriers to primary care. In addition to our statement below, we offer our continued support to work together to ensure patients come first and are provided the highest quality care. Should you need any additional information or if you have any questions, please feel free to contact ACOFP at [advocacy@acofp.org](mailto:advocacy@acofp.org) or (847) 952-5100.

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Sincerely,



Robert C. DeLuca, DO, FACOFP *dist.*  
ACOFP President

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Arlington Heights, IL

The American College of Osteopathic Family Physicians (ACOFP) appreciates the action taken through this Executive Order to ensure patients have the opportunity to choose the healthcare that is best for them. We strongly support efforts to empower patients by ensuring they have access to, and are incentivized to, seek the most efficient care—primary care. We believe that if given the opportunity and the appropriate incentives, patients will choose lower-cost preventive care and avoid unnecessary high-cost specialty care.

Overall, as an organization, our osteopathic family medicine physicians practice medicine in a variety of settings, including solo, small, rural, Native American/Indian healthcare, group, and alternative payment model practices. As family physicians, our members are at the front lines of care and often are leading the efforts to find lower-cost pathways to avoid chronic, complex, and potentially costly medical conditions.

### **Leveraging Primary Care to Reduce Costs and Improve Quality**

ACOFP believes changes must be made to ensure patients have consistent access to primary care services. Studies have established that increased access to primary care is more likely to result in preventive services and treatment for medical conditions before they become chronic and costly to treat. As healthcare costs continue to increase, primary care must be incentivized to improve quality and curb unnecessary healthcare spending. We strongly support flexibilities to ensure there are no barriers to accessing primary care services. Therefore, we support efforts to:

1. Ensure low-cost preventive care is covered before the deductible;
2. Revise regulations to treat direct primary care (DPC) arrangements as eligible medical expenses for payment through a health savings account (HSA); and
3. Provide transparency on the cost of healthcare services, especially high-cost specialty care that could be avoided.

ACOFP especially supports the DPC model, which has been effective in not only supporting primary care physicians by reducing burdens, but also has expanded access for patients across a variety of geographic settings. Currently, there is uncertainty around whether patients can use their HSAs to pay for DPC arrangements, which leads to concerns that such arrangements would invalidate any other healthcare coverage. This severely impairs patients' ability to obtain the most efficient care, while also ensuring protection from unavoidable emergency situations.

In addition, DPC arrangements exemplify transparency and patient empowerment. Patients are charged a flat monthly fee for an agreed upon set of services and are active partners in their healthcare through accurate information at the point of care and full involvement in medical and financial choices. Supporting this model is critical to protecting and supporting access to primary care services and ensuring patients continue to have access to low-cost, high-quality care. ACOFP believes that providing transparency on the cost of services, in addition to the benefit of preventive medicine, will encourage patients to seek more efficient care and reduce overall healthcare costs.

### **Conclusion**

We strongly believe that primary care physicians are critical to reducing healthcare costs by focusing on preventive services and reducing avoidable and high-cost downstream utilization. ACOFP therefore supports efforts to remove barriers to primary care and to provide opportunities for patients to take control of their healthcare through transparent, cost-effective arrangements, like DPC. We offer our continued support and welcome the opportunity to provide additional details or discuss these issues further.