



One Prince Street
Alexandria, VA 22314-3318
☎ 703.838.0033
☎ 703.548.1890

November 15, 2017

Ms. Seema Verma
Administrator
Centers for Medicare and Medicaid Services
7500 Security Boulevard
Baltimore, Maryland 21244-1850

Dear Ms. Verma:

AMGA applauds the Centers for Medicare & Medicaid Services (CMS) decision to use its waiver and demonstration authorities to test how Medicare Advantage (MA) can be included under the Medicare Access and CHIP Reauthorization Act's (MACRA) Quality Payment Program (QPP) Alternative Payment Model (APM) pathway before 2019. AMGA has long supported inclusion of MA into the APM pathway and we are very pleased that CMS is taking such positive steps to recognize providers that are moving to value.

In order to meet CMS' goal of "incentivizing participation in" MA arrangements by 2018, the demonstration will need to be developed and disseminated quickly to the healthcare community. AMGA believes that the most effective way to develop this demonstration in time to allow MA participation in the 2018 performance year would be to develop and post a "submission form" that mirrors current Advanced APM requirements. MA plans and MA ECs would be required to meet the requirements for comparable quality measures, Certified Electronic Health Record Technology (CEHRT), as well as nominal risk requirements. CMS in turn would review these submissions to determine whether MA plans or MA ECs qualify as 2018 Advanced APMs. Developing the MA-Advanced APM demonstration by using existing and well-understood Advanced APM requirements will allow providers that already are meeting the MACRA goal of moving to value quickly and efficiently.

Again, AMGA applauds CMS' decision to develop a demonstration to include MA as an Advanced APM in the 2018 performance year. We believe this presents opportunities to both increase APM participation as well as accelerate improvements in care quality and reductions in spending growth.

If you have any questions about these comments, please do not hesitate to contact David Introcaso, Ph.D., Senior Director of Regulatory and Public Policy, at dintrocaso@amga.org or at 703.842.0774.

Sincerely,

A handwritten signature in cursive script that reads "Jerry Penso". The signature is written in a dark ink and is positioned below the word "Sincerely,".

Jerry Penso, M.D., M.B.A.
President and Chief Executive Officer
AMGA

