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Jeffrey Bailet, MD
Committee Chairperson
Physician-Focused Payment Model
Technical Advisory Committee
Office of the Assistant Secretary for
Planning and Evaluation
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dear Dr. Bailet:

On behalf of the physician and medical student members of the American Medical Association (AMA), I write to express our concerns with the current Physician-Focused Payment Model Technical Advisory Committee (PTAC) proposal reviews. During the PTAC's April meeting, the Committee will review and vote on four physician-focused alternative payment models (APMs). The AMA is surprised and disappointed that the Preliminary Review Teams (PRT) are recommending to the full Committee that none of these proposals be recommended to the Secretary for testing or implementation.

The AMA has repeatedly emphasized the need for a clear pathway and technical assistance for organizations developing APM proposals. In addition, we have continued to highlight the need for a variety of APMs to ensure all physicians have the ability to participate in an APM, regardless of their specialty or practice model. The PTAC is a key step in the development of APMs, and the process should encourage testing and initial implementation of promising models.

In the Merit-Based Incentive Payment System and APM final rule, the Centers for Medicare & Medicaid Services (CMS) finalized a set of criteria that the PTAC uses to evaluate APMs (see 42 CFR § 414.1465). These criteria include: scope, quality and cost, payment methodology, value over volume, flexibility, ability to be evaluated, integration and care coordination, patient choice, patient safety, and health information technology. The AMA generally supports these criteria; however, the negative PRT reviews of all four proposals suggest that the PTAC may need to re-examine its review process. We recommend that the PTAC work with APM developers to help them make necessary adjustments to meet all required criteria.

In order for the Quality Payment Program to be successful, CMS, the PTAC, and medical societies must work together to develop and test APMs. The AMA looks forward to continuing to work with the PTAC and medical specialty societies to ensure there is a robust selection of APMs in which all physicians can participate. Thank you for your consideration.

Sincerely,

James L. Madara, MD