

July 5, 2018

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health & Human Services
200 Independence Avenue, SW, Mail Stop 314G
Washington, DC 20201

Re: CMS-10673

Dear Administrator Verma:

On behalf of our physician and medical student members, the American Medical Association (AMA) commends the Centers for Medicare & Medicaid Services (CMS) for developing a demonstration project to allow physicians participating in innovative alternative payment models (APMs) under Medicare Advantage (MA) to avoid penalties in the Merit-Based Incentive Payment System (MIPS) program. The Medicare Advantage Qualifying Payment Arrangement Incentive (MAQI) demonstration recognizes the advantages of APMs in MA, and will afford physicians participating in risk arrangements in MA similar advantages to those enjoyed by physicians participating in risk arrangements in traditional Medicare APMs.

We strongly support CMS' plan to allow the first performance period for the MAQI demonstration to begin in 2018. We also strongly support allowing physicians to count MA APM participation toward Advanced APM thresholds in 2018, and thus potentially receive a five percent incentive payment a year earlier than is permitted under the current All-Payer Combination Option in MIPS. APMs can provide significant opportunities for physicians to improve the quality and outcomes of their patients' care, and CMS should continue to develop, test, and provide credit to physicians for participation in new APM models as quickly as possible.

In addition, we strongly support CMS' proposal that the MAQI demonstration will allow participating physicians to be exempt from MIPS reporting and negative payment adjustments for a given year if they participate to a sufficient degree in qualifying payment arrangements with MA plans. This option would allow physicians to avoid MIPS penalties, without requiring them to be Qualifying APM Participants (QPs) or otherwise meet MIPS exclusion criteria of the Quality Payment Program (QPP). The AMA supports allowing APM participants that may not meet Advanced APM QP or partial QP thresholds to be exempt from MIPS penalties.

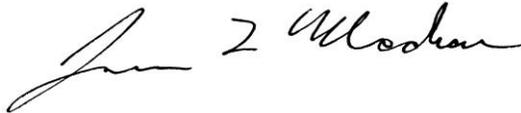
The AMA believes APMs can provide significant opportunities to physicians to improve patients' quality of care and clinical outcomes. Recognizing the advantages of APMs, we are encouraged by the development of the MAQI model, which will allow physicians participating in MA APMs to avoid MIPS penalties as early as 2018, and earn an incentive payment as early as 2019, creating an incentive for more

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physicians to participate in these models. We look forward to working further with CMS on the refinement of this model.

Thank you for the opportunity to comment. If you have questions, please contact Margaret Garikes, Vice President for Federal Affairs, at margaret.garikes@ama-assn.org or 202-789-7409.

Sincerely,

A handwritten signature in black ink, appearing to read "James L. Madara". The signature is written in a cursive style with a large initial "J" and a stylized "M".

James L. Madara, MD