**Medicare Red Tape Relief Project**

Submissions accepted by the Committee on Ways and Means, Subcommittee on Health

Date: August 25, 2017

Name of Submitting Organization: Physicians Advocacy Institute

Address for Submitting Organization: 1010 Mt. Pleasant Road, Winnetka, IL 60093

Name of Submitting Staff: Kelly Kenney, Executive Vice President/CEO

Submitting Staff Phone: (312) 543-7955

Submitting Staff E-mail: k2strategiesllc@gmail.com

Statutory

Regulatory ✓

**Please describe the submitting organization’s interaction with the Medicare program:**

PAI is a not-for-profit advocacy organization focused on securing fair and transparent payment for physicians. PAI’s Board is comprised of CEOs/former CEOs of state medical associations from California, Connecticut, Georgia, Nebraska, New York, North Carolina, South Carolina, Tennessee and Texas and a Kentucky physician. A significant portion of the members of these and other states’ medical societies treat Medicare patients and submit claims to Medicare.

**Short Description:** Quality Payment Program (QPP) Predictability for Physicians’ Payments

**Summary:** Participation in the QPP represents a dramatic shift impacting how physicians across the country are paid. Caution should be taken to ensure proposals to change the program do not unintentionally put some patients, physicians, and practices at a disadvantage and/or increase the complexity of the program.

|  |
| --- |
|  |

**Related Statute/Regulation:** CMS 2017/2018 MACRA Payment Year Regulations

**Proposed Solution:** PAI would like to stress the importance of and need to rely on empirical data from the program to support significant changes that could have a substantial impact on physicians’ reimbursements. Furthermore, there needs to be an assurance that the data supporting any program changes is verified, accurate, and validated. Without transparency and data from the program, it is challenging to affirmatively support changes that could put physicians at risk for greater potential losses.

PAI would like to emphasize the importance of sharing feedback reports on a timely and continuous basis so that practices have adequate time to not only make improvements for the remainder of a current performance period, but also for the subsequent performance period to improve their overall MIPS performance scores. Physicians should be held harmless for lack of timely and actionable feedback reports.