

November 19, 2021

The Honorable Ron Wyden
Chairman
U.S. Senate Committee on Finance
219 Dirksen Senate Office Building
Washington, D.C. 20510

The Honorable Mike Crapo
Ranking Member
U.S. Senate Committee on Finance
219 Dirksen Senate Office Building
Washington, D.C. 20510

The Honorable Richard Neal
Chairman
U.S. House Committee on Ways & Means
1102 Longworth House Office Building
Washington, D.C. 20515

The Honorable Kevin Brady
Ranking Member
U.S. House Committee on Ways & Means
1102 Longworth House Office Building
Washington, D.C. 20515

The Honorable Frank Pallone
Chairman
U.S. House Committee on Energy & Commerce
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Cathy McMorris Rodgers
Ranking Member
U.S. House Committee on Energy & Commerce
2125 Rayburn House Office Building
Washington, D.C. 20515

RE: Request to Extend Critical Technical Support Program for Small Physician Practices Participating in Medicare Value-Based Payment Initiatives

Dear Chairman Wyden, Ranking Member Crapo, Chairman Neal, Ranking Member Brady, Chairman Pallone, and Ranking Member McMorris Rodgers,

On behalf of the undersigned organizations representing diverse stakeholders who share the goal of supporting small practices in the Medicare program who serve beneficiaries in rural locations, health professional shortage areas, and medically underserved areas, we write to urge you to extend a critically important technical assistance program that supports clinicians who are participating in Medicare value-based payment initiatives, known as the Quality Payment Program Small, Underserved, and Rural Support (QPP-SURS) program.

Beginning in 2010 with the Health Information Technology for Economic and Clinical Health (HITECH) Act, several technical assistance programs have supported clinicians with their participation in health IT adoption and quality improvement efforts. More recently, the widely bipartisan Medicare Access and CHIP Reauthorization Act of 2015 (MACRA) established the Quality Payment Program and the QPP-SURS program, which provides direct assistance to eligible clinicians required to participate in the Merit-based Incentive Payment System (MIPS). This assistance is critical to ensure that small practices in rural and underserved areas have the support and tools necessary to succeed in the MIPS program. **However, after five years of support, QPP-SURS will end in February 2022, leaving clinicians without a direct technical assistance program to help them navigate continuously changing regulations in the remaining years and increasing performance thresholds of the QPP despite MIPS continuing until 2027.** Removing this critical infrastructure support could further exacerbate disparities in communities already facing limited access to high-quality health care.

Payment reform programs are complex, and clinicians require supplemental resources and guidance to meet the substantial quality and cost containment aspirations of payment models, particularly those in

underserved areas. Clinicians that fail to meet the MIPS performance threshold could be penalized up to nine percent¹ for poor performance, which is a significant financial impact for practices that often serve high-need, high-cost patients and have slim margins. Successful participation requires practices to have a robust information technology infrastructure to collect and report data. Since technical assistance contractors provide full-time analysts dedicated to interpreting regulation, it would be unreasonable to expect small practices to independently develop the level of expertise necessary for success.

A recent GAO report² found that technical assistance contractors for the QPP-SURS program reported positive provider satisfaction ratings ranging from about 98.0 to 99.4 percent. This foundation to navigate regulatory changes is difficult for settings with limited support staff that already have multiple roles in practice operations, which limits their ability and availability to dedicate efforts to understanding and participating in quality improvement programs. The COVID-19 pandemic has further exacerbated this issue by restricting the availability of these clinicians to understand updates and changes to payment reform programs. The QPP-SURS program provides crucial support that allows practices to successfully participate in MIPS and build the skill sets they need to transition to alternative payment models.

We thank you for your commitment to providing health care for underserved communities and urge you to extend this critically important program as part of any moving legislative package. Please contact Bianca Desai at bdesai@healthspieren.com for more information.

Sincerely,

Alliant Health Solutions
Altarum
American Academy of Family Physicians (AAFP)
American Academy of Home Care Medicine (AAHCM)
American College of Physicians (ACP)
American Medical Association (AMA)
American Osteopathic Association (AOA)
Civitas Networks for Health
Comagine Health
Healthcentric Advisors
Medical Group Management Association (MGMA)
MetaStar, Inc.
National Coalition on Health Care (NCHC)
National Partnership for Women and Families (NPWF)
Northwestern University Feinberg School of Medicine
Physicians Advocacy Institute (PAI)
Primary Care Collaborative (PCC)
QSource
Quality Insights
Stratis Health
TMF Health Quality Institute
UK HealthCare

¹ <https://public-inspection.federalregister.gov/2021-14973.pdf>

² <https://www.gao.gov/assets/gao-22-104667.pdf>