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January 15, 2019

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

Dear Ms. Verma:

On behalf of the AMGA, I am writing in regards to the application process that the Centers for Medicare & Medicaid Services (CMS) instituted as part of the reforms to the Medicare Shared Savings Program (MSSP). Given the significant changes to the MSSP, AMGA and its members are requesting that CMS change the application deadline to April 19 so that providers have additional time to examine the new program requirements and ensure they fully understand their options before applying to participate.

As you are aware, applications to participate in the MSSP are due February 19. This is less than two months from when the final rule was published. Had the rule simply updated the MSSP, this may not be an issue. However, the final rule includes major revisions to the MSSP, which will take time for our membership to fully review and understand. Simply stated, it is not reasonable for them to review the regulation and make an informed application decision in the timeframe provided.

This deadline is not the only priority facing our member intuitions and practice groups. For example, quality measure reporting for a number of Medicare programs is handled in January and February. In many of our member groups, the same staff will be responsible for working on both the quality measure reporting and the MSSP application process. This situation can be ameliorated by shifting the deadline for the MSSP.

In addition to the burdensome conflicts with other priorities, our members have indicated that properly determining their level of participation in the revised MSSP is challenging, particularly with the tight deadline. They have just started the process of reviewing the application materials, which became available the week of January 7. Based on their initial review of the application, our members are beginning the work to determine how long it will take to complete and what resources need to be assigned to the task. They will need to determine how they will be classified under the new MSSP models: high- or low-revenue and if they are re-entering or renewing. Some also may wish to end their current agreements early and voluntarily enroll for the July 1, 2019, start date. Members also must determine if they would like to use prospective

or retrospective assignment. Modestly delaying the application deadline will help these members review the regulation and determine their best course of action.

Based on these concerns, AMGA requests that you delay the application deadline until April 19. This will ensure that AMGA members have additional time to fully understand the MSSP requirements and responsibilities and make the most appropriate enrollment decision.

Thank you for your consideration on this matter. Should you have questions, please do not hesitate to contact AMGA's Darryl M. Drevna, senior director of regulatory affairs at 703.838.0033 ext. 339 or at ddrevna@amga.org.

Sincerely,

A handwritten signature in cursive script that reads "Jerry Penso".

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