



HEALTHCARE LEADERS FOR  
**ACCOUNTABLE  
INNOVATION IN  
MEDICARE & MEDICAID**

November 20, 2017

The Honorable Seema Verma  
Administrator  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

Dear Administrator Verma:

The *Healthcare Leaders for Accountable Innovation in Medicare and Medicaid (AIM)* coalition is pleased to share our perspective with you on the “Centers for Medicare and Medicaid Services: Innovation Center New Direction” Request for Information (RFI). We believe there is a vital and appropriate role the Center for Medicare and Medicaid Innovation (CMMI) can and should play in advancing healthcare delivery.

*AIM*, a coalition representing patients, hospitals, physicians, and healthcare leaders, formed last year to encourage policy makers to address concerns regarding CMMI that arose among those who deliver and depend upon quality healthcare, as well as members of Congress of both parties. These concerns focused on proposed large-scale demonstration projects that can affect significant portions of the nation’s healthcare system and have unintended consequences for patients, the need for consistent collaboration with providers, the patient community, and the private sector in selecting and implementing new payment and delivery models; and the imperative to maintain vigilant monitoring and quality measurement. The *AIM* coalition believes strongly in dynamic innovation that strengthens patient access to care and that offers the promise of a Medicare and Medicaid program defined by quality, value, and exemplary patient health outcomes.

Earlier this year, the group developed a set of principles to improve CMMI. The principles call for a CMMI that, among other improvements and safeguards, engages in appropriately-scaled, time-limited demonstration projects, greater transparency, improved data-sharing, and broader collaboration with the private sector. Adoption of these principles can help to ensure that demonstrations are widely embraced and supported, a contrast to recent episodes that saw widespread resistance from patients and the healthcare community.

We were pleased to see the majority of our principles are closely aligned with the RFI's Guiding Principles. These include:

- Appropriately-scaled model tests that are voluntary, transparent, and structured in a way to ensure valid results that foster strong scientifically valid testing prior to expansion;
- Working collaboratively with the private sector to harness market competition and innovation; and
- Providing transparency and meaningful stakeholder engagement.

We would emphasize some other areas that CMMI may want to consider when considering guiding principles going forward. They are included in the attached *AIM* principles and highlighted below:

- Respect Congress's role in making health policy changes;
- Improve sharing of data from CMMI testing; and
- Strengthen beneficiary safeguards.

*AIM* coalition members are leaders in health system transformation, committed to ensuring innovation and value while achieving long-term sustainability. We welcome the opportunity to work with you in optimizing CMMI so it can fulfill its intended mission.

Thank you for your commitment to fostering an affordable, accessible healthcare system focused on driving value through innovation. To make that possible, we encourage that CMMI finalize this evaluation process and fully consider the feedback received before launching any new demonstration projects. If you have questions, please feel free to contact Debbie Withey at 202-449-3435.

Sincerely,

American Academy of Allergy, Asthma & Immunology  
American Alliance of Orthopaedic Executives  
American Association of Neurological Surgeons  
American Autoimmune Related Diseases Association  
American College of Rheumatology  
American Health Care Association / National Center for Assisted Living  
American Psychiatric Association  
American Speech-Language-Hearing Association  
AMGA  
Arthritis Foundation  
California Hepatitis C Task Force, Inc.  
CAPG  
Coalition of State Rheumatology Organizations  
Community Oncology Alliance  
Congress of Neurological Surgeons  
Federation of American Hospitals

Global Liver Institute  
Healthcare Leadership Council  
ICAN, International Cancer Advocacy Network  
IFAA  
Kidney Cancer Association  
Lupus and Allied Diseases Association, Inc.  
Mended Hearts, Inc.  
National Alliance on Mental Illness  
National Association of ACOs  
National Association of Hepatitis Task Forces  
National Association of Nutrition and Aging Services Programs  
National Association of Social Workers, North Carolina Chapter  
National Committee for Quality Assurance  
National Council of Asian Pacific Islander Physicians  
National Hispanic Medical Association  
National Infusion Center Association  
National Minority Quality Forum  
Patients Rising  
Pharmaceutical Research and Manufacturers of America  
RetireSafe  
StopAfib.org  
The Grant Group, LLC  
The Joint Commission  
The Society of Thoracic Surgeons  
The US Oncology Network  
The Veterans Health Council  
Vietnam Veterans of America  
VNAA

Enclosure: *AIM* principles



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As our healthcare system evolves toward value-based care, it is essential to test new ideas that have the potential to make healthcare more quality-driven, cost-efficient, and patient-focused. Fortunately, the Center for Medicare and Medicaid Innovation (CMMI) provides such a robust research and development platform to experiment and evaluate new payment and delivery approaches and determine what works and why. Because of the potential impact, however, on patients, healthcare providers, and other health system stakeholders, it is essential that such experimentation comply with the original intent of CMMI and be limited in scope and fully transparent. Concerns over both the scale and scope of CMMI's recent demonstrations and its claim of authority to expand demonstrations nationwide and, in effect, enact permanent policy changes should be addressed. Congress should have the ability to intervene in these matters, but its ability to do so is hampered by Congressional Budget Office scoring rules that assume theoretical savings from CMMI initiatives. Clearly establishing CMMI's role to verify "proof of concept" and Congress's role to act on that proof would help build the trust and confidence needed to ensure CMMI's success.

## Principles

- **Foster strong scientifically valid testing prior to expansion.** Initial CMMI experiments of new payment and delivery models should have comprehensive, methodologically sound, transparent evaluation plans and occur via appropriately scaled, time-limited tests in order to protect beneficiaries and participants from unintended or adverse consequences. Participation in model tests must be voluntary and should be structured in such a way to ensure valid results.
- **Respect Congress's role in making health policy changes.** The legislative branch has a responsibility to oversee CMMI and must approve model expansions and related changes to Medicare and Medicaid. CMMI's important work in testing new models that improve quality or reduce costs without harming beneficiary access or healthcare outcomes should inform congressional decisions on national health policy.
- **Consistently provide transparency and meaningful stakeholder engagement.** CMMI's process for developing, testing, and expanding models must be more open, transparent, and predictable to provide meaningful opportunities for stakeholder input, ensure safeguards for patients and providers, and improve accountability. This includes: developing new models in close consultation with affected stakeholders, maintaining complete transparency in decision-making and program procedures, and fully evaluating data and seeking patient and stakeholder input prior to model expansions.
- **Improve sharing of data from CMMI testing.** Data from CMMI model tests should be made public on an ongoing basis to facilitate assessments of their impact on care quality and spending and to inform parallel efforts in the private sector.
- **Strengthen beneficiary safeguards.** Beneficiaries must not be compelled to participate in a demonstration project and must be adequately educated about the project as well as protected by safeguards to ensure continued access and care quality.
- **Collaborate with the private sector.** For CMMI to have an optimal impact on improving healthcare quality and cost-efficiency, it must work collaboratively with the private sector and harness market competition and innovation. In selecting demonstration projects, priority should be given to partnerships involving providers, payers, and other private sector entities throughout the healthcare continuum. CMMI models should support private sector organization efforts to advance healthcare value, rather than impeding such efforts by picking winners and losers in the market.