



Congress of  
Neurological  
Surgeons

March 1, 2021

Michelle Schreiber, MD  
Deputy Director for Quality and Value  
Centers for Medicare & Medicaid Services  
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Mail Stop S3-02-01  
Baltimore, MD 21244

Via email: Michelle.Schreiber@cms.hhs.gov

**SUBJECT: MIPS Value Pathways Program**

Dear Dr. Schreiber:

The undersigned organizations are reaching out regarding the Centers for Medicare & Medicaid Services (CMS) draft Merit-based Incentive Payment System (MIPS) Value Pathways candidate on Improving Outcomes for Degenerative Spinal Disease. Together, our organizations<sup>1</sup> represent the physicians who provide surgical and therapeutic procedures to patients with degenerative spinal disease.

We appreciate CMS seeking our feedback on this draft MIPS Value Pathways (MVP). As highlighted in previous communications, measuring the value of spine disease is complex given the diversity of procedures used to treat a significantly heterogeneous patient population. ***Given the complexity of this population and the current limitations of MIPS to incentivize care coordination across episodes of care, we do not believe that a Degenerative Spine Disease MVP is feasible at this time. We therefore strongly recommend that CMS suspend this topic for the first wave of MVPs for 2022. Instead, we urge the agency to continue to work with our specialties to find a more feasible solution for measuring quality and costs related to this population.***

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<sup>1</sup> Founded in 1933, as the trusted leaders in advancing musculoskeletal health, the American Academy of Orthopaedic Surgeons (AAOS) is the preeminent provider of musculoskeletal education to orthopaedic surgeons, including spine surgeons. The American Academy of Physical Medicine and Rehabilitation (AAPM&R) is the national medical specialty organization representing physicians who are specialists in physical medicine and rehabilitation (PM&R). PM&R physicians, also known as physiatrists, treat a wide variety of medical conditions affecting the brain, spinal cord, nerves, bones, joints, ligaments, muscles, and tendons. PM&R physicians evaluate and treat injuries, illnesses, and disability and are experts in designing comprehensive, patient-centered treatment plans. Physiatrists utilize cutting-edge as well as time-tested treatments to maximize function and quality of life. The American Association of Neurological Surgeons (AANS), founded in 1931, and the Congress of Neurological Surgeons (CNS), founded in 1951, are the two largest scientific and educational associations for neurosurgical professionals in the world. These groups represent over 8,000 neurosurgeons worldwide. The American Spine Registry (ASR) is a collaborative effort between the AANS and the AAOS and incorporates the resources and experience of both organizations. ASR is a far-reaching program that facilitates the participation of all US spine surgeons in a shared, data-collection platform. Our goal is to improve spine care outcomes through data. More information about the ASR is available at [www.americanspineregistry.org](http://www.americanspineregistry.org).

As CMS continues to iron out the details of this new pathway, it has emphasized the need to start with “simple” MVPs that can be formed easily and logically based on existing MIPS measures. Unfortunately, a Degenerative Spine Disease MVP does not fit this description, so it is premature to include this topic as a priority at this time.

We are nevertheless encouraged to hear that CMS is interested in working with relevant clinical stakeholders to drive the development of MVPs and that it will not move forward if relevant clinical stakeholders are not satisfied with the MVP. As you are aware, ASR is a groundbreaking collaborative effort between the AAOS and AANS and is in the process of collecting data on risk-adjustment for degenerative spine procedures. Hence, we will have an opportunity to build a more informed MVP candidate on this topic in the future.

Thank you for considering our request. The undersigned organizations look forward to working with CMS to identify more innovative ways to evaluate and incentivize high-value spine care. Should you have any questions or want to schedule a meeting to discuss future goals, please contact Rachel Groman at [rgroman@hhs.com](mailto:rgroman@hhs.com); Shreyasi Deb, PhD, MBA at [deb@aaos.org](mailto:deb@aaos.org); or [bradtke@aapmr.org](mailto:bradtke@aapmr.org).

Sincerely,

American Academy of Physical Medicine and Rehabilitation  
American Association of Neurological Surgeons  
American Association of Orthopaedic Surgeons  
Congress of Neurological Surgeons