

August 24, 2022

Chiquita Brooks-LaSure
Administrator
Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services
200 Independent Avenue SW
Washington, DC 20201

Meena Seshamani, MD PhD
Deputy Administrator and Director, Center on
Medicare
Centers for Medicare & Medicaid Services,
Department of Health and Human Services,
7500 Security Boulevard,
Baltimore, MD 21244-1850

Dear Administrator Brooks-LaSure and Dr. Seshamani

On behalf of the undersigned organizations, we are writing to request an extension in responding to the Centers for Medicare and Medicaid Services' (CMS) [request for information](#) regarding various aspects of the Medicare Advantage (MA) program [RIN: 0938-AV01]. CMS published this request on August 1, 2022, with the intent to use the requested information to inform potential future rulemaking or other policy development. To be assured consideration, comments must be received by August 31, 2022.

The undersigned organizations greatly appreciate CMS providing an opportunity to inform how the MA program can be improved. MA is a critical part of CMS' vision to advance health equity; expand access to affordable coverage and care; drive high-quality, person-centered care; and promote affordability and sustainability of Medicare. We also appreciate CMS' partnership to better understand how care innovations are changing outcomes and costs, as well as how MA is working for the enrollee population. To this end, the undersigned organizations are interested in providing feedback on ways MA has changed over time, including but not limited to: MA physician payments and contract terms; value-based arrangements with MA plans; prior authorizations and other utilization management approaches used by MA plans; access to care; administrative burden; and data collection.

We remain committed to any efforts that engage stakeholders and drive innovation in ways that best serve people with Medicare; however, **we request an extension in responding to this request as a 30-day public comment period is simply not enough time.** The healthcare community is currently working to provide public comment on proposed policy changes for Medicare payments under the Physician Fee Schedule (MPFS), which must be submitted by September 6, 2022. This major proposed rule addresses several changes to policies and has significant financial and workflow implications for the physician community. In addition, the healthcare community is also focused on providing comments to the Outpatient Prospective Payment System proposal, REH rule, and HHS' non-discrimination rule. To ensure that we provide robust, thoughtful comments on these important rules and the request for information, the undersigned organizations believe additional time is needed. **This extension should provide for a submission date that is at least thirty days beyond the MPFS proposed rule comment period (i.e., October 6, 2022).**

In considering this request, the undersigned organizations urge CMS to remain cognizant of the importance of collaborating with the physician community in improving MA, as well as the impact to the patient population.

Thank you for your time and consideration regarding this request. If you have questions, please contact Brian Outland, Director of Regulatory Affairs at boutland@acponline.org or 202-261-4544.

Sincerely,

American Academy of Allergy, Asthma & Immunology

American Academy of Family Physicians

American Academy of Hospice and Palliative Medicine

American Association For The Study Of Liver Disease

American Association of Clinical Endocrinology

American College of Cardiology

American College of Allergy, Asthma & Immunology

American College of Gastroenterology

American College of Physicians

American Gastroenterological Association

American Geriatrics Society

American Society for Transplantation and Cellular Therapy

American Society of Nephrology

American Thoracic Society

Association for Clinical Oncology

Chest Physicians

Endocrine Society

Medical Group Management Association (MGMA)

Society of General Internal Medicine

Society of Hospital Medicine

Society for Post-Acute and Long-Term Medicine

Renal Physicians Association (RPA)