



Jan. 10, 2018

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

Dear Administrator Verma,

On behalf of 40,000 medical practice executives and 12,500 organizations that deliver nearly half the healthcare in the United States, the Medical Group Management Association (MGMA) requests CMS immediately release 2018 Merit-based Incentive Payment System (MIPS) eligibility information, including exemptions under the low-volume threshold and special status as non-patient-facing or hospital-based.

Contrary to MGMA's recommendation to maintain 90-day reporting for the quality component of MIPS, in final regulations CMS chose to quadruple the 2018 MIPS quality reporting period from 90 to 365 days and mandate full-year quality reporting beginning Jan. 1. This decision requires immediate action by physician practices.

We are extremely concerned that despite being held accountable for reporting that began more than a week ago, physicians do not have basic eligibility information to determine whether they are even included in the MIPS program. For medical group practices that manage reporting for dozens or even hundreds of clinicians under the program, this information is vital to the complex clinical and administrative coordination necessary to participate in MIPS.

MGMA supports CMS' goal of reducing clinician burden and believes equipping physician groups with clear and timely MIPS program information is essential toward that aim. We urge the agency not to repeat the delays of 2017, during which eligibility notifications were release in late April.

We appreciate your consideration of this request. Should you have any questions, please contact Jennifer McLaughlin at 202-293-3450 or jmclaughlin@mgma.org.

Sincerely,

/s/

Anders M. Gilberg, MGA
Senior Vice President, Government Affairs