



May 16, 2017

The Honorable Tom Price, M.D.
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

Dear Secretary Price:

The Healthcare Leaders for Accountable Innovation in Medicare and Medicaid (AIM) would like to share our thoughts with you about the vital and appropriate role the Center for Medicare and Medicaid Innovation (CMMI) can and should play in advancing healthcare delivery.

The Healthcare Leaders for Accountable Innovation in Medicare and Medicaid, a coalition representing patients, hospitals, physicians, and healthcare leaders, has 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 to proposals that went well beyond conventional demonstrations or tests.

The principles call for CMMI to:

- **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 healthcare 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.

Our healthcare system is transitioning, as it should to value-based care. This requires the appropriate testing of new ideas to make healthcare more quality-driven, cost-effective, and patient-centered. A CMMI that adheres to the aforementioned principles can be a highly effective agent in advancing this necessary progress.

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.

If you have any questions, please feel free to contact Debbie Witchey at (202) 449-3435. Thank you for your consideration and continuing leadership.

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
American Speech-Language-Hearing Association
Arthritis Foundation
California Hepatitis C Task Force, Inc.
CAPG
Coalition of State Rheumatology Organizations
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 Social Workers, North Carolina Chapter
National Council of Asian Pacific Islander Physician
National Hispanic Medical Association
National Infusion Center Association
National Minority Quality Forum
Patients Rising
Pharmaceutical Research and Manufacturers of America
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

cc: CMS Administrator Seema Verma
CMS Deputy Administrator Patrick Conway