

October 28, 2020

The Honorable Terri Sewell
United States House of Representatives
2201 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Adrian Smith
United States House of Representatives
502 Cannon House Office Building
Washington, D.C. 20515

Dear Representatives Sewell and Smith:

We, the undersigned 311 groups, write to express our strong support for **H.R. 5741, the “Strengthening Innovation in Medicare and Medicaid Act.”** This bipartisan legislation will make significant strides in addressing patient and provider concerns about the impact of the Center for Medicare and Medicaid Innovation (CMMI) demonstrations on access to care and the quality of care. We urge Congress to ensure the needs of Medicare and Medicaid beneficiaries – a significant proportion of whom have serious or life-threatening health conditions or disabilities – are safeguarded. We are concerned that too many CMMI models endanger patient access to healthcare providers and medically necessary treatments and create unnecessary obstacles for vulnerable patients.

H.R. 5741 provides safeguards for CMMI to ensure CMMI demonstrations are patient-focused and benefit beneficiaries. In the long run, improving healthcare delivery and quality is the best way to achieve sustainable cost savings. The legislation would:

- **Incorporate feedback from beneficiaries and other stakeholders in developing CMMI models** by formalizing the process with advance public notice and an opportunity for input. It is essential to ensure transparency and greater accountability before selecting, designing, testing, evaluating, or expanding a demonstration. Patients need greater transparency to better understand how CMMI models being tested will affect their care and treatment options.
- **Limit testing of new delivery and payment models** to no more than five years, ensuring beneficiaries will no longer be subjected to potentially harmful models for sustained periods of time.
- **Limit the scope of models** to only the number of participants necessary to achieve a statistically valid sample. Several on-going or proposed CMMI Phase I models are national in scope, affecting a large number of beneficiaries and providers before the demonstration’s consequences have been fully evaluated.
- **Address potential adverse impacts on patients** by requiring continuous real-time monitoring of the effects of a model on beneficiaries, especially as it relates to health disparities. This will help mitigate any adverse impact on Medicare and Medicaid beneficiaries who are some of the nation’s sickest patients.
- **Reaffirm the role of Congress in the expansion of CMMI models** by establishing an expedited process for Congress to disapprove of the proposed expansion of a CMMI demonstration. This process adds an important layer of oversight to CMMI demonstrations to improve transparency and help maintain patient safety and access.

- **Establish the opportunity for judicial review at key CMMI decision points.** Current law does not provide for an independent judicial process to evaluate the effect of CMMI decisions on patients and providers.

We urge Congress to take action on H.R. 5741 expeditiously to ensure CMMI operates as intended and develops value-based projects that protect patients and ensure access to efficient, high quality care.

Sincerely,

1in9, Long Island Breast Cancer Coalition/Hewlett House
 60 Plus Association
 ADAP Advocacy Association
 Advocates for Responsible Care
 Aging Life Care Association®
 AIDS CT
 Aimed Alliance
 Alabama Gastroenterological Society
 Alabama Hospice and Palliative Care Organization
 Alaska Brain Injury Network
 Alaska Counseling Association
 Alaska Society of Eye Physicians and Surgeons
 Alliance for Patient Access
 ALS Advocate, The ALS Association Greater Philadelphia Chapter
 American Academy of Ophthalmology
 American Association for Respiratory Care
 American Association of Neurological Surgeons
 American Autoimmune Related Diseases Association
 American Behcet's Disease Association (ABDA)
 American Chronic Pain Association
 American College of Rheumatology
 American Gastroenterological Association
 American Geriatrics Society
 American Health Care Association/ National Center for Assisted Living (AHCA/NCAL)
 American Kidney Fund
 American Liver Foundation
 American Liver Foundation – Heartland Division (IN, KY, OH, WV)
 American Occupational Therapy Association
 American Podiatric Medical Association
 American Society for Pain Management Nursing
 American Society of Transplant Surgeons
 America's Blood Centers
 APS Foundation of America, Inc
 Arizona Ophthalmological Society
 Arizona Bioindustry Association, Inc. (AZBio)
 Arizona United Rheumatology Alliance
 Arizona Urological Society
 Arkansas Osteopathic Medical Association
 Arthritis Center of Nebraska
 Arthritis Foundation
 Association for Clinical Oncology

Association for Home & Hospice Care of North Carolina
Association of University Centers on Disabilities (AUCD)
Association of Women in Rheumatology
Biocom
BioForward Wisconsin
BioKansas
Bio Nebraska
BioNJ
BioOhio
Bioscience Association of North Dakota
Bioscience Association of West Virginia
BioUtah
Brain Injury Alliance of Colorado
Brain Injury Alliance of Iowa
Brain Injury Alliance of Nebraska
Brain Injury Alliance of New Mexico
Brain Injury Alliance of Oregon
Brain Injury Association of America
Brain Injury Association of Kansas and Greater Kansas City
Brain Injury Association of MS
Brain Injury Association of Louisiana
Brain Injury Association of New Hampshire
Brain Injury Association of Rhode Island
Brain Injury Association of Vermont
Bramlett Medical
Buechler Insurance Services
California Academy of Eye Physicians and Surgeons
California Academy of Nutrition and Dietetics
California Chronic Care Coalition
California Health Collaborative
California Hepatitis C Task Force
California Hospice Network
California Life Sciences Association
California Rheumatology Alliance
CancerCare
Center for Independence of the Disabled, NY
Centro de Mi Salud, LLC
Chronic Disease Coalition
Coalition of Hematology Oncology Practices
Coalition of State Rheumatology Organizations
Colorado Cross-Disability Coalition
Colorado Health Care Association
Colorado Podiatric Medical Association
Colorado Rheumatology Association
Community Access National Network (CANN)
Community Oncology Alliance
Congress of Neurological Surgeons
Cutaneous Lymphoma Foundation
Delaware Academy of Medicine and the Delaware Public Health Association
Delaware Academy of Ophthalmology
Delaware Ecumenical Council

Dia de La Mujer Latina
Digestive Health Physicians Association: DHPA
Economic Development Partnership of Alabama
Emphysema Foundation for Our Right to Survive (EFFORTS)
Empire State Hematology and Oncology Society
Familia Unida Living with MS "Familia Unida"
First Step Staffing, Inc.
Florida Podiatric Medical Association
Florida Society of Rheumatology
Gastroparesis Support Services Inc.
Georgia Bio
Georgia Health Care Association
Georgia Hospice and Palliative Care Organization
Georgia Ovarian Cancer Alliance
Get Up Stand Up to Cure Paralysis
GO2 Foundation for Lung Cancer
Great Plains Diabetes LLC
Hands Around Lupus: Life Solutions
Hawaii COPD Coalition
Hawaii Medical Association
Hawaii Podiatric Medical Association
Hawaii Society of Clinical Oncology
Health Agents for America
Health Care Association of New Jersey
HealthCare Institute of New Jersey (HINJ)
Healthcare Leadership Council
Health Center Partners of Southern California
Homecare and Hospice Association of New Jersey
Homecare and Hospice Association of Utah
Home Care Association of Florida
Hospice and Palliative Care Association of New York State
Hospice Maui
ICAN, International Cancer Advocacy Network
Idaho Podiatric Medical Association
Illinois Biotechnology Innovation Organization (iBIO)
Illinois Podiatry Medical Association
Indiana Health Industry Forum
Indiana Oncology Society
International Association of Hepatitis Task Forces
International Foundation for Autoimmune & Autoinflammatory Arthritis
International Pemphigus and Pemphigoid Foundation
ION Solutions
Iowa Oncology Society
IVX Health
Kansas Society of Clinical Oncology
Kentucky Academy of Eye Physician and Surgeons
Kentucky Podiatric Medical Association
Kentucky Rare Disease Advisory Council
LI Transplant Recipient International Organization
Large Urology Group Practice Association (LUGPA)
Let's Talk About Change, LLC

Licensed Professional Counselors Association
Life Sciences Pennsylvania
Liver Health Connection
Living Hope for Mental Health, Inc.
Louisiana Oncology Society
LUNGeivity Foundation
Lupus Alliance of Upstate New York
Lupus and Allied Diseases Association, Inc.
Lupus Foundation of America
Lupus Foundation of America, Philadelphia Tri-State Chapter
Lupus Foundation of Arkansas, Inc.
Lupus Foundation New England
Lupus of Nevada
Maine Podiatric Medical Association
MassBio
Massachusetts Foot and Ankle Society
Medical Oncology Association of Southern California, Inc.
Michigan Biosciences Industry Association (MichBio)
Michigan HomeCare & Hospice Association
MidWest Rheumatology Association
Milwaukee Rheumatology Center
Minnesota Public Health Association
Minnesota Society of Clinical Oncology
Mississippi Arthritis and Rheumatism Society
Mississippi Oncology Society
Mississippi Psychiatric Association
Missouri Oncology Society
Missouri Society of Eye Physicians & Surgeons
Montana Academy of Ophthalmology
Montana Bioscience Association
Montana Public Health Association
Montana State Oncology Society
Multiple Sclerosis Foundation
NAMI Barrow
National Asian Pacific Center on Aging (NAPCA)
National Association of Nutrition and Aging Services Programs (NANASP)
National Blood Clot Alliance
National Certification Commission for Acupuncture & Oriental Medicine (NCCAOM)
National CFIDS Foundation
National Dental Association
National Hispanic Medical Association
National Hospice & Palliative Care Organization (NHPCO)
National Infusion Center Association
National Medical Association
National Oncology State Network
National Organization of Rheumatology Managers
National Vulvodynia Association
Nebraska Academy of Eye Physicians and Surgeons
Nebraska Rheumatology Society
Nebraska Rural Health Association
Nebraska State Grange

Nebraska State Medical Association
Nebraska Taxpayers for Freedom
Neuropathy Action Foundation (NAF)
Nevada Biotechnology & Health Science Consortium
Nevada Oncology Society
New Hampshire Podiatric Medical Association
New Hampshire Prostate Cancer Coalition
New Jersey Association of Mental Health and Addiction Agencies
New Jersey Rheumatology Association
New Mexico Alliance of Health Councils
New Mexico Biotechnology & Biomedical Association
New Mexico Chronic Disease Prevention Council
New Mexico Health Care Association
New Mexico Podiatric Medical Association
NewYorkBIO
New York State Podiatric Medical Association
NHMH - No Health without Mental Health
North Carolina Biosciences Organization
North Carolina Business Group on Health
North Carolina Health Care Facilities Association
North Carolina Oncology Association
North Carolina Public Health Association
North Carolina Rheumatology Association
NC Society of Gastroenterology
North Dakota Brain Injury Association of Michigan
North Dakota Society of Eye Physicians and Surgeons
North Dakota Public Health Association
North Hawaii Hospice, Inc.
Ohio Council for Home Care and Hospice
Ohio Federation for Health Equity and Social Justice
Oklahoma Academy of Ophthalmology
Oklahoma Public Health Association
Oklahoma Society of Clinical Oncology
Oncology Center of Iowa
Oncology Managers of Florida
Oral Cancer Foundation
Oregon Bioscience Association
Oregon Podiatric Medical Association
Ovarian Cancer Research Alliance
Partnership to Fight Chronic Disease
Partnership to Improve Patient Care
Personalized Medicine Coalition
Physician Advocacy Institute
Piedmont Arthritis Clinic
Platte Valley Ambulance Service
Port Isabel-San Benito Navigation District
Prism Health North Texas
Reflex Sympathetic Dystrophy Syndrome Association (AUCD)
Regarding Cancer
Retiresafe
Rheumatology Alliance of Louisiana

Rheumatology Association of Nevada
Rheumatology Nurses Society
Rio Grande Valley Diabetes Association
Rocky Mountain Oncology Society
Ruby A. Neeson Diabetes Awareness Foundation
Rush To Live Org
SADS Foundation (Sudden Arrhythmia Death Syndromes)
See
Seven Peaks Counseling
Sickle Cell Disease Association of America, Inc.
Silverstone International
Sjögren's and Lupus Foundation of Hawaii
Society for Social Work Leadership in Health Care
Society for Social Work Leadership In Health Care – MOKAN
Society for Social Work Leadership in Healthcare Northern California Chapter
South Carolina Home Care & Hospice Association
South Carolina Oncology Society
South Carolina Rheumatism Society
South Dakota Academy of Ophthalmology
South Dakota Biotech
South Dakota Public Health Association
Southern California Biomedical Council (SoCalBio)
SquareOne Consulting
Survivors Cancer Action Network
TAHC&H
Tennessee Neurological Society
Tennessee Oncology Practice Society
Texas Association for Home Care & Hospice
Texas Association of Obstetricians & Gynecologists
Texas Business Group on Health
Texas Healthcare and Bioscience Institute
Texas Oncology
Texas Ophthalmological Society
Texas Podiatric Medical Association
Texas Renal Coalition
Texas Society of Clinical Oncology
Texas State Association of Occupational Health Nurses
The Arizona Clinical Oncology Society
The Facial Pain Advocacy Alliance
The Lighthouse School
The Mended Hearts
The Society of Thoracic Surgeons
The US Oncology Network
TRIO Seattle
United Ostomy Associations of America
United Spinal Association
United States Brain Injury Alliance
USCOPD Coalition
Utah Ovarian Cancer Alliance (UOCA)
Utah State Orthopedic Society
Vermont Ambulance Association

Vermont Podiatric Medical Association
Virginia Association of Hematologist & Oncologist
Virginia Public Health Association
Virginia Society of Rheumatologists
Washington Academy of Eye Physicians & Surgeons
Washington Rheumatology Alliance
Washington State Podiatric Medical Association
Washington State Prostate Cancer Coalition
Washington State Urology Society
West Valley Ovarian Cancer Alliance
West Virginia Academy of Eye Physicians & Surgeons
West Virginia Oncology Society
Wisconsin Association of Hematology & Oncology
Wisconsin Health Care Association
Wyoming Business Coalition on Health
Wyoming Epilepsy Association