

February 9, 2022

Elizabeth Fowler
Deputy Administrator & Director
Center for Medicare and Medicaid Innovation
7500 Security Boulevard
Baltimore, MD 21244

Re: CMS Innovation Center Listening Session: Incorporating Beneficiary Perspectives into Model Testing, Implementation, and Evaluation

Dear Ms. Fowler:

The Partnership to Improve Patient Care is pleased that CMMI is conducting this listening session on incorporating beneficiary perspectives. Since its founding, PIPC has been at the forefront of applying principles of patient-centeredness to the nation's health care system – from the generation of comparative clinical effectiveness research at the Patient-Centered Outcomes Research Institute (PCORI), to the translation of evidence into patient care in a manner that achieves value to the patient. Having driven the concepts of patient-centeredness and patient engagement in the conduct of research, PIPC looks forward to bringing the voices of patients and people with disabilities to the discussion of how to advance patient-centered principles throughout an evolving health care system.

First and foremost, we want to reiterate the importance of CMMI establishing the “patient-centeredness criteria” mandated under Section 1115A of the Affordable Care Act, which requires evaluation of alternative payment models (APMs) against patient-centeredness criteria. An engaged process for establishing these criteria would ensure that beneficiaries have a voice in how success is measured within APMs so that they are not measured solely on payer-centered benchmarks. Such criteria would also be impactful beyond CMMI as other health systems seek to advance more patient-centered models of care.

Since the creation of PCORI, PIPC has similarly prioritized efforts to urge CMMI to meaningfully engage patients and people with disabilities in the development of its models, as well as in model testing, implementation, and evaluation. In 2014, we were very concerned that the Health Care Payment and Learning Action Network (LAN) was launched without input from patients and people with disabilities, as Medicare worked toward the goal of enrolling a higher percentage of patients in alternative payment models. CMS responded by creating 3 positions on the LAN Guiding Committee for patients and consumers, including participation from PIPC's Executive Director, Sara van Geertruyden. We look forward to CMMI working with the LAN to convey the importance of beneficiary perspectives and the need to prioritize best practices for model contractors that focus on achieving outcomes that matter to patients.

Within CMMI, we have consistently strongly advocated for patient advisory panels to guide the development of alternative payment models and for CMMI to engage with patients and people with disabilities in the development of patient-centeredness criteria to measure the success of alternative payment models, as called for in statute. Publicly, CMMI has consistently stated its intent to advance models that are centered on patients. Yet, despite continued input from PIPC and others, CMMI does not have a clear process for engagement of patients and people with disabilities nor have we seen the LAN's efforts prioritize capturing best practices for beneficiary engagement or for capturing data on the patient experience of care in CMMI models.

Therefore, we are excited for this listening session to be the first of many as CMMI renews its efforts to center its work on those with the most to benefit from its success – patients and people with disabilities.

We appreciate that CMMI is looking to its stakeholders to help inform the Center's beneficiary engagement strategy across its portfolio and over the life cycle of models. PIPC looks forward to being an engaged partner in this most important work.

Sincerely,



Tony Coelho
Chairman
Partnership to Improve Patient Care