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**March 10, 2020**

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*Welcome to America's Physician Groups' "Healthcare on the Hill," where you can get the latest on healthcare happenings in our nation's capital--and with a special focus on the value-based care movement. Here's what you will find in this edition:*

- *APG Files Comments on Part I and Part II of the MA Advance Rate Notice*
- *Final Interoperability and Patient Access Rules Released*
- *CMS Issues a Calendar with Deadlines Associated with the Direct Contracting Model*
- *Coronavirus FAQs*
- *Register Today! APG Annual Conference 2020 in San Diego!*

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*Valinda Rutledge  
Senior Vice President of Federal Affairs  
America's Physician Groups*

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### **APG Files Comments on Part I and Part II of the MA Advance Rate Notice**

APG recently filled [comments](#) on [Part I](#) and [Part II](#) of the **Medicare Advantage (MA) Rate Notice**. Our comments focused on the following issues to ensure MA remains instrumental to the transformation of our healthcare system.

- Supports moving to 75% encounter data and 25% RAPS data to calculate risk scores but we encourage the Centers for Medicare & Medicaid Services (CMS) to support a more streamlined and consistent process to be applied consistently by the plans in order to reduce inconsistencies between the RAPS and the EDPS system.
- Recommends that CMS continues to explore alternative mechanisms to adjust the benchmark cap so that high performers in the quality programs are rewarded – thereby allowing additional benefits to be re-invested back to the beneficiary.
- Supports the changes in the Risk Adjustment Model that will recognize the need for additional resources for beneficiaries with multiple chronic conditions and thereby increasing payments.
- Concerned that the proposed ESRD rates are too low and we believe using county benchmark rates rather than state would be more representative.
- Recommends that CMS consider Puerto Rico's enrollment disparities when developing the final kidney acquisition pricing and the impact of insufficient overall ESRD reimbursement rates. We continue to view an adjustment to the average geographic minimum for calculating MA payments as a reasonable and necessary policy change to help achieve long-term stability for Puerto Rico's struggling health care system.

APG also stressed that coronavirus will **impact** MAOs in a variety of areas and adjustments will need to be made. We proposed readjusting rates this year to supplement the impact of decreased risk adjustment captured in the 2021 payment year as well as potentially increased costs of beneficiaries. We are aware that the extreme and uncontrollable circumstances policy in the Star Ratings is restricted with Federal Emergency Management Agency (FEMA) designation thereby the coronavirus situation would not qualify. Thus, we requested that CMS **expand the definition of emergency declaration beyond FEMA**. Our comment letter for the **MA proposed rule** will be submitted in early April.

### **CMS Issues a Calendar with Deadlines Associated with the Direct Contracting Model**

CMS issued a calendar to provide important dates associated with the Direct Contracting Model and Global Professional options. You can view the calendar [here](#).

### Coronavirus FAQs

On Friday, President Trump signed the **\$8.3B [Coronavirus Preparedness and Response Supplemental Appropriations Act, 2020](#)**, an emergency funding package for states and federal agencies to respond to the coronavirus outbreak. Funding will go to help with further research, development of a vaccine, test kit distribution, and for other equipment. It is reported that states could receive funding in the next 30 days.

Visit the Centers for Disease Control and Prevention [website](#) for detailed information about the coronavirus and **view CMS FAQs [here](#)**.

### APG Annual Conference 2020

[Register today](#) for **America's Physician Groups Annual Conference 2020 The Value Movement Grows Up: What's Next?** May 28-30 in San Diego. With national recognized speakers and educational program that matters to you, our Annual Conference is the place to be for anyone engaged in value-based care. Visit our [Annual Conference 2020 website](#) for the latest information and a full **Conference agenda**.



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