



September 7, 2023

Partnership for Quality Measurement
Pre-Rulemaking Measure Review (PRMR) Roster Comments

RE: PRMR Clinician and Hospital Committee Roster Public Comments

The National Association of ACOs (NAACOS) appreciates the opportunity to submit comments on the publication of committee rosters for the new Pre-Rulemaking Measure Review (PRMR) process. NAACOS represents more than 400 accountable care organizations (ACOs) in Medicare, Medicaid, and commercial insurance working on behalf of health systems and physician provider organizations across the nation to improve quality of care for patients and reduce health care cost. NAACOS members serve over 8 million beneficiaries in Medicare value-based payment models, including the Medicare Shared Savings Program (MSSP) and the ACO Realizing Equity, Access, and Community Health (REACH) Model, among other alternative payment models (APMs). We support the broad inclusion of organizations and individuals with experience in ACOs and other value arrangements on both the hospital and clinician committees. Including ACOs in these discussions will ensure the quality measure consideration process addresses the importance of value-based care efforts in quality improvement.

It is not clear which committee(s) will be responsible for reviewing ACO measures for the MSSP. NAACOS strongly recommends both the clinician and hospital committees review the MSSP measure set. This review process must recognize that ACOs are comprised of physician practices, hospitals and other providers. Accordingly, each setting-specific committee should consider the measure set for cross-cutting programs like ACOs. NAACOS also seeks to have more integration of value-based care in quality review. CMS has a goal to have all patients in an accountable care relationship by 2030; to do this, we must now plan for the future where all quality programs will need to consider value arrangements. Review of the MSSP measure set on both the clinician and hospital committees will serve as a good first step toward this goal.

Thank you for the opportunity to provide feedback on the rosters and for the opportunity to participate in this important process. If you have any questions, please contact Aisha Pittman, senior vice president, government affairs at aisha_pittman@naacos.com.

Sincerely,

Clif Gaus, Sc.D.
President and CEO
NAACOS