

July 28, 2023

Elizabeth Fowler, PhD, JD
Deputy Administrator and Director
Center for Medicare and Medicaid Innovation
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-5540-NC
P.O. Box 8013
Baltimore, MD 21244-8013

Dear Deputy Director Fowler:

On behalf of the physicians represented by the undersigned organizations, we are writing to request a 60-day extension to the comment period for the Request for Information; Episode-Based Payment Model (CMS-5540-NC), published in the Federal Register on July 18, 2023. The undersigned organizations greatly appreciate the opportunity to provide feedback on the extensive list of questions posed in the Request for Information (RFI).

However, the 30-day comment period is insufficient time for us to thoughtfully respond given the breadth and depth of the questions CMMI is requesting feedback on. In addition, as you are aware, this RFI was published just days after the Calendar Year 2024 Medicare Physician Fee Schedule/Quality Payment Program and Medicare Outpatient Prospective Payment System proposed rules were released. It is nearly impossible for our organizations' staff and member-experts, the majority of whom are practicing clinicians, to respond to both rules along with the RFI in such a truncated timeline.

We respectfully urge CMS and CMMI to extend the comment period for the RFI on Episode-Based Payment Models until at least October 18, 2023. This will give our organizations the necessary time to prepare the detailed response that CMMI is seeking. Our members have been steadfast and trusted partners in CMS' shift to value-based care over the last decade. They have been at the forefront of this transition, and their experience and input will be critical to implementing next generation models that are streamlined, patient-centered, and successful at achieving the goal of physician-led, team-based care functioning in an Accountable Care Organization model. Should the implementation be rushed, without such guidance from the frontline physicians, it may lead to increased burden, limited uptake, and roadblocks later in the rulemaking process.

We hope that this request will be conferred in the spirit in which it is requested. We look forward to hearing from you and continuing our long-standing partnership in providing high-quality, evidence-

based care to our nation's Medicare beneficiaries. Should you have any questions, please reach out to Shreyasi Deb, PhD, MBA, AAOS Office of Government Relations at deb@aaos.org.

Sincerely,

American Association of Orthopaedic Surgeons
AdvaMed
Alliance of Wound Care Stakeholders
American Academy of Facial Plastic and Reconstructive Surgery
American Academy of Ophthalmology
American Academy of Otolaryngology – Head and Neck Surgery
American Association of Neurological Surgeons
American College of Cardiology
American College of Obstetricians and Gynecologists
American College of Surgeons
American Medical Association
American Society for Metabolic and Bariatric Surgery
American Society for Surgery of the Hand Professional Organization
American Society of Anesthesiologists
American Society of Breast Surgeons
American Society of Cataract and Refractive Surgery
American Society of Colon & Rectal Surgeons
American Society of Plastic Surgeons
American Society of Retina Specialists
American Urogynecologic Society
American Urological Association
Congress of Neurological Surgeons
Medical Device Manufacturers Association
Society for Vascular Surgery