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June 15, 2021

Michael Chernew, PhD
Chairman
Medicare Payment Advisory Commission
425 I Street NW, Suite 701
Washington, DC 20001

Dear Dr. Chernew:

The Medicare Payment Advisory Committee (MedPAC) has recommended to the Secretary of the Department of Health and Human Services that a more harmonized portfolio with fewer alternative payment models (APMs) be maintained to support the strategic objective of reducing spending and improving quality. The Society of General Internal Medicine (SGIM), a member-based medical association of more than 3,000 of the world's leading academic general internists, supports this recommendation, but also urges MedPAC to explicitly identify improving health equity and reducing disparities as an additional strategic objective.

SGIM members have participated in the Medicare Quality Payment Program since its inception. SGIM is dedicated to improving access to care for all populations, eliminating health disparities, and enhancing medical education. We note that historically many APMs have failed to account for social determinants of health, financially penalized organizations caring for socially at-risk patients, and created a disincentive to care for vulnerable populations. This threatens to reduce access to care, and to ultimately widen care gaps as socially at-risk populations are excluded from APMs and their possible benefits. It is therefore critical that MedPAC make explicit a goal of having APMs reduce health disparities.

2020 was dominated by the COVID-19 pandemic which highlighted pervasive structural inequities across all sectors of society and fueled drastic disparities in the impact of COVID-19. We now have a unique opportunity and a moral imperative to do better. APMs can improve quality and reduce spending. Well-structured APMs have the potential to achieve these goals while also improving health equity if social risk is accounted for, interventions that address social determinants of health are encouraged, and equity-focused outcome measures are created. As a first step, SGIM urges MedPAC to incorporate improving health equity as a core objective for APMs into its recommendations to HHS.

As such, SGIM recommends MedPAC update its draft recommendation to read:

The Secretary should implement a more harmonized portfolio of fewer alternative payment models that are designed to work together to support the strategic objectives of reducing spending, improving quality, and advancing health equity.

Thank you for your work on this important issue and for considering this request. Should you wish to discuss this further, please contact Erika Miller at emiller@dc-crd.com.



Sincerely,

A handwritten signature in purple ink, which appears to read 'M. Lypson, MD'. The signature is fluid and cursive, with the last name 'Lypson' being the most legible part.

Monica L. Lypson, MD, MHPE
President, SGIM