



P.O. Box 73127
Washington, D.C. 20056
(202) 737-5980
info@populationhealthalliance.org
www.populationhealthalliance.org

September 2, 2014

Ms. Marilyn Tavenner
Administrator
Centers for Medicare and Medicaid Services

Re: CMS-1612-P

Dear Ms. Tavenner:

The Population Health Alliance (PHA) is pleased to submit these comments in response to the proposed rule on the Calendar Year 2015 Medicare Physician Fee Schedule. PHA convenes a broad range of stakeholders whose focus is to improve the health of populations. Through advocacy, research and education PHA advances population health management strategies to improve care quality and health outcomes to reduce preventable costs for those living with or at risk for chronic conditions. Our diverse membership of more than 100 organizations and individuals includes physician groups, nurses, other health care professionals, hospital systems, wellness and prevention providers, population health management organizations, pharmaceutical manufacturers, pharmacies, pharmacy benefit managers, health information technology vendors, employers, researchers and academics.

PHA applauds the Centers for Medicare and Medicaid Services' efforts to improve care for beneficiaries with multiple chronic conditions by facilitating payment for non-face-to-face care coordination services. PHA would like to express support particularly for the revisions to the prior proposal related to requirements for billing for chronic care management (CCM) services provided "incident to" services provided by a Medicare practitioner. We are pleased that CMS has modified the proposal so that clinicians providing care coordination services are not required to be direct employees of the Medicare practitioner's practice. Furthermore, we support the requirement that the care coordination be provided under "general" rather than "direct" supervision of the practitioner.

We believe that the new CCM billing code underscores the importance of these services and will provide improved beneficiary access to these services. We encourage CMS to seek additional ways to foster collaboration among providers and coordination of care in Medicare.

Thanks you for the opportunity to submit these comments. Please feel free to contact us at Vicki.shepard@healthways.com if PHA or any of our members can be of further assistance.

Sincerely,

Fred Goldstein
Acting Executive Director
Population Health Alliance

Vicki Shepard
Chair, Government Affairs Committee
Population Health Alliance