August 21, 2017

The Honorable Seema Verma
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Hubert H. Humphrey Building, Room 445–G
200 Independence Avenue, SW
Washington, DC  20201

Re: CY 2018 Updates to the Quality Payment Program

Dear Administrator Verma:

The Society of Nuclear Medicine and Molecular Imaging (SNMMI) represents over 17,000 medical professionals and our core purpose is to improve human health by advancing nuclear medicine, molecular imaging and radionuclide therapy. We appreciate the opportunity to respond to this proposed rule titled CY 2018 Updates to the Quality Payment Program (see: https://s3.amazonaws.com/public-inspection.federalregister.gov/2017-13010.pdf).

**Recognizing Continuing Medical Education as an Improvement Activity**

We, like the Council of Medical Specialty Societies (CMSS), enthusiastically support the proposal to explicitly recognize Continuing Medical Education (CME) as an Improvement Activity within the Merit-Based Incentive Payment System (MIPS).

CMSS participated in the process of defining Continuing Medical Education to reflect its ability to improve not only knowledge, but also clinical performance. Therefore, we are specifically supportive of the following section in the proposed rule:

The proposed adoption by CMS of CME as an Improvement Activity will facilitate better health outcomes while providing needed flexibility to health professionals. Including CME in CMS’ new value-based assessments will incentivize physicians to participate in CME activities that improve their practice. Moreover, this will also reduce perceptions of additional burdens on physicians, by aligning Improvement Activities with CME that physicians are already doing to meet other requirements, such as maintaining board certification, re-licensing in their states, etc.
Incorporating SNMMI Quality Measure
We thank CMS for proposing to continue including quality measure 147 the “Nuclear Medicine: Correlation with Existing Imaging Studies for All Patients Undergoing Bone Scintigraphy.” That measure is now maintained by SNMMI and is listed on page 958 of the Proposed Rule. We will encourage nuclear medicine physicians to report on it and we are working to identify/develop additional measures.

Maintaining Current MIPS Weighting
We support CMS’s proposal to maintain the current weighting of the MIPS factors. Quality should be a foundation CMS focus and keeping quality at 60 percent is appropriate. We also have not yet seen a working model of CMS’s cost measures and agree that they should be weighted at zero percent in 2018. We recognize that current law requires weighting this measure at 30% in the near future, however the demonstrated application of cost measures is necessary before appropriate weighting should be applied.

Summary
Thank you for your responsiveness to input from stakeholders and attempts to make MIPS more provider friendly. We especially support the proposal to recognize modern Continuing Medical Education (CME) as an improvement activity in the Merit-based Incentive Payment System (MIPS). The contact person on these issues at SNMMI is Wayne Powell, Director of Health Policy and Regulatory Affairs and he may be reached at either 703.326.1182 or wpowell@snmmi.org.

Sincerely,

Bennett S. Greenspan, MD, MS, FACNM, FACR
President