



October 23, 2018

The Honorable Seema Verma, Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Blvd.
Baltimore, MD 21244

Dear Administrator Verma:

The Alliance of Community Health Plans (ACHP) applauds your ongoing efforts both to improve quality of care and reduce unnecessary burden on health plans and providers. As community-based, non-profit health plans, our members consistently demonstrate better performance as a group than non-ACHP plans on publicly reported clinical quality measures. They are proud of the high quality, affordable coverage and care they provide, and welcome opportunities to prove their value through public and private quality programs.

We urge you to continue the work you have begun in reducing burden while maintaining quality by re-instating the deeming process for Medicare Advantage plans with private accreditation where there is clear overlap and redundancy.

Deeming is advantageous for Medicare beneficiaries, CMS and health plans in many ways. For example, deeming will:

- Reduce redundancy in oversight
- Reduce the regulatory burden on CMS
- Reduce the burden on health plans undergoing multiple audits
- Free-up resources used in duplicative work for more direct impact on quality of care
- Reduce taxpayer burden by maximizing private sector expertise for oversight

ACHP strongly encourages elimination of duplicative documentation, such as requiring submission of multiple quality improvement plans, and synchronization of CMS auditing and private accreditation schedules to ensure full benefit of deeming to all accredited health plans. Additionally, alignment of reporting templates will significantly reduce confusion about reporting requirements and will ensure that health plan effort is focused on high-value activities that are usable for multiple, meaningful purposes.

Congress expressly established deeming in the bipartisan Balanced Budget Act of 1997 to reduce redundant oversight for plans that subject themselves to rigorous, private-sector accreditation review and establish incentives for plans to meet higher standards through accreditation. Deeming for health plans enjoys bipartisan support because it enhances oversight, minimizes burden and recognizes the value of non-governmental resources to ensure high-quality.

Given the substantial benefits of deeming, we respectfully ask that you revive the program, enhanced with synchronization of auditing and accreditation schedules and standardized reporting templates. As always, I'd like to offer our team as a resource as CMS considers this important step. Please feel free to reach out to Eva Powell, Senior Manager, Quality Programs. She can be reached at epowell@achp.org.

Sincerely,

Ceci Connolly

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Alliance of Community Health Plans (ACHP) and its members improve the health of the communities we serve and actively lead the transformation of health care to promote high quality, affordable care and superior consumer experience.