February 1, 2022

The Honorable Michael Bennet
United States Senate
261 Russell Senate Office Building
Washington, DC 20510

The Honorable Bill Cassidy
United States Senate
520 Hart Senate Office Building
Washington, DC 20510

The Honorable Peter Welch
United States House of Representatives
2187 Rayburn House Office Building
Washington, DC 20515

The Honorable Michael Burgess
United States House of Representatives
2161 Rayburn House Office Building
Washington, DC 20515

Dear Senator Bennet, Senator Cassidy, Representative Welch, and Representative Burgess:

On behalf of the undersigned organizations representing diverse national stakeholders who share the goal of supporting small provider practices in the Medicare program who serve beneficiaries in rural locations, health professional shortage areas, and medically underserved areas, we commend you on the introduction of the SURS Extension Act and eagerly express our strong support for the bill. This critical legislation extends an important technical assistance program known as the Quality Payment Program Small Underserved, and Rural Support (QPP-SURS) program, which provides support to practices who participate in Medicare value-based payment initiatives, and we strongly urge its swift passage by Congress.

As you know, the widely bipartisan Medicare Access and CHIP Reauthorization Act of 2015 (MACRA) established the Quality Payment Program and the QPP-SURS program, which provides direct assistance to eligible clinicians required to participate in the Merit-based Incentive Payment System (MIPS). This assistance is critical to ensure that small practices in rural and underserved areas have the support and tools necessary to succeed in the MIPS program. However, after five years of support, QPP-SURS will end February 15, 2022, leaving clinicians without a direct technical assistance program to help them navigate continuously changing regulations in the remaining years and increasing performance thresholds of the QPP despite MIPS continuing until 2027. Removing this critical infrastructure support could further exacerbate disparities in communities already facing limited access to high-quality health care.

In addition, payment reform programs are complex, and clinicians require supplemental resources and guidance to meet the substantial quality and cost containment aspirations of payment models. This is particularly true for small practices that qualify for QPP-SURS. Practices that fail to meet the MIPS performance threshold could be penalized up to nine percent[1] for poor performance, which is a significant financial impact for providers that often serve high-need, high-cost patients in underserved areas. The COVID-19 pandemic has further exacerbated this issue by restricting the availability of these clinicians to understand updates and changes to payment reform programs.

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[1] https://public-inspection.federalregister.gov/2021-14973.pdf

The SURS Extension Act extends the QPP-SURS program until 2027 and ensures that small practices in rural and underserved areas have the support and tools necessary to succeed in the MIPS program.

Once again, thank you for your leadership in supporting small medical practices across the United States. We look forward to working with you to ensure passage of this critical legislation.

Sincerely,

American Academy of Family Physicians (AAFP)
American Academy of Home Care Medicine (AAHCM)
American Association of Hip & Knee Surgeons
American College of Physicians (ACP)
American Health Quality Association (AHQA)
American Medical Association (AMA)
American Osteopathic Association (AOA)
Alliant Health Solutions
Altarum
Civitas Networks for Health
Colorado Medical Society
Comagine Health
Healthcentric Advisors
Medical Group Management Association (MGMA)
MetaStar, Inc.
National Coalition on Health Care (NCHC)
National Partnership for Women & Families (NPWF)
Northwestern University Feinberg School of Medicine
Qsource
Quality Insights
Primary Care Collaborative
Stratis Health
TMF Health Quality Institute
UK HealthCare
Vermont Medical Society