

## **Performance and Reporting Periods**

The NPRM requires that APM and MIPS participation be measured starting January 1, 2017, with the first MIPS payment adjustments being made in January 2019, and the first incentive payments to Advanced APM participants being made in mid-2019. Collectively, we believe the start date should be moved back so that physicians have time to prepare, have adequate notice of final program requirements and thresholds, a final list of qualified APMs is available, and the performance period is closer to when incentive payments will be made. We believe this extra time will also be helpful for vendors, registries, and others to update their systems to accommodate the new program requirements.

In addition, we urge CMS to allow more suitable reporting periods for both the MIPS and APM programs. A full calendar year requirement can create significant administrative burden for practices and limit innovation while not improving the validity of the data, particularly in categories where measures are not automatically calculated by CMS. Instead, physicians should be able to select a shorter reporting period or use the full calendar year (with an optional look-back to January 1 in 2017) if they believe it is more appropriate for their practice.

We thank you for your consideration of our recommendations. We are committed to working collaboratively and constructively with CMS and others as final regulations are prepared and the agency works to implement these MACRA reforms.

Sincerely,

American Medical Association  
Advocacy Council of the American College of Allergy, Asthma and Immunology  
AMDA – The Society for Post-Acute and Long-Term Care Medicine  
American Academy of Allergy, Asthma and Immunology  
American Academy of Dermatology Association  
American Academy of Emergency Medicine  
American Academy of Facial Plastic and Reconstructive Surgery  
American Academy of Family Physicians  
American Academy of Home Care Medicine  
American Academy of Neurology  
American Academy of Neuromuscular and Electrodiagnostic Medicine  
American Academy of Ophthalmology  
American Academy of Orthopaedic Surgeons  
American Academy of Otolaryngology-Head and Neck Surgery  
American Academy of Pain Medicine  
American Academy of Physical Medicine and Rehabilitation  
American Academy of Otolaryngic Allergy  
American Association for Geriatric Psychiatry  
American Association of Clinical Urologists  
American Association of Hip & Knee Surgeons  
American Association of Neurological Surgeons  
American College of Cardiology  
American College of Emergency Physicians  
American College of Medical Genetics and Genomics  
American College of Mohs Surgery