



Demetrios Kouzoukas, Principal Deputy Administrator and Director, Center for Medicare Centers for Medicare & Medicaid Services,
Department of Health and Human Services
P.O. Box 8013
Baltimore, MD 21244-8016

CC: Cheri Rice, Deputy Director, Center for Medicare

Re: Advancing Value-Based Payment through Medicare Advantage Star Ratings During the COVID-19 Pandemic

Dear Demetrios,

The Alliance of Community Health Plans (ACHP) appreciates the recent flexibilities offered in the Medicare Advantage Star Ratings program in response to the impact of COVID-19 allowing providers to focus on care. ACHP values your commitment and partnership to ensure the MA Stars Program continues to incentivize high quality care and better patient outcomes. The disruption caused by COVID-19 provides an unprecedented opportunity to modernize the quality measurement enterprise. ACHP is eager to work with CMS toward this larger goal as we learn from this public health crisis.

While ACHP will submit formal comments on the Medicare and Medicaid Programs; Policy and Regulatory Revision in Response to the COVID-19 Public Health Emergency Interim Final Regulation with Comment (CMS-1744-IFC), we offer the following high-level recommendations without delay.

Our recommendations are based on a foundation of guiding principles:

- Advancing the goals of value-based payment, centered on high-quality care, should remain a primary objective.
- Health plans and their provider partners need flexibility to meet the immediate needs of the current public health crisis without fear of negative financial impact.
- Medicare beneficiaries should continue to have access to information that supports high-quality choices, and they should not be denied the additional benefits enabled by quality bonus payments to high-quality health plans.
- The significant differences in impact of COVID-19 across markets is a critical factor to consider when determining quality bonus payments during the COVID-19 pandemic.

ACHP's recommendations for the MA Star Ratings Programs during the COVID-19 Pandemic encompass both provisions included in the interim final rule and additional proposals for consideration.

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2021 Star Ratings

- Carry forward MA Stars 2020 performance rates on CAHPS and HEDIS measures for Stars 2021 for purposes of quality bonus payments, as detailed in the Interim Final Rule.
- Create a demonstration project for 3.5 star plans that were positioned to increase their star rating to receive quality bonus payments.

2022 Star Ratings

- Carry forward overall star ratings and quality bonus payments from 2021 to 2022.
- Continue demonstration project for ascending 3.5 star plans.
- Require submission of data to evaluate impact of COVID-19 on quality of care, rather than quality bonus payment calculation.

2023 Star Ratings

- Begin acting on knowledge gained from the pandemic and CMS' 20 years of experience with quality measurement by moving toward a more meaningful and near real-time system of measurement and accountability.

The current quality measurement system, and MA Stars as its cornerstone, are long overdue for modernization. A refresh that is focused on meaningful measures that better support value-based payment and informed consumer decision-making will require extensive modeling and stakeholder input. CMS' leadership is needed to ensure lessons learned from the COVID-19 public health crisis are used as an opportunity to get started.

ACHP and our member organizations continue to deliver high-quality coverage and care during this public health crisis, and we appreciate CMS' collaboration on quality ratings and measurement. While our members are focused on maintaining their high-quality standards, it is paramount that CMS mitigate the potential long-term impacts on the MA Star Ratings Program as a result of this public health emergency.

We look forward to working with CMS to make important progress on modernizing the MA Stars program to fully support value-based payment. Please contact Michael Bagel, ACHP Director of Public Policy with any questions at mbagel@achp.org.

Sincerely,

Ceci Connolly
President and CEO, ACHP