

November 16, 2015

Mr. Andy Slavitt
Acting Administrator
Centers for Medicare & Medicaid Services (CMS)
Department of Health and Human Services
Attention: CMS-3321-NC
P.O. Box 8016
Baltimore, MD 21244-8016

Subject: CMS-3321-NC Request for Information Regarding Implementation of the Merit-Based Incentive Payment System, Promotion of Alternative Payment Models, and Incentive Payments for Participation in Eligible Alternative Payment Models

Dear Mr. Slavitt:

The American Joint Replacement Registry (AJRR) appreciates the opportunity to review and comment on the Centers for Medicare & Medicaid (CMS) *Request for Information Regarding Implementation of the Merit-Based Incentive Payment System, Promotion of Alternative Payment Models, and Incentive Payments for Participation in Eligible Alternative Payment Models*, published in the Federal Register on October 1, 2015.

AJRR is the only national hip and knee arthroplasty registry collecting data in all 50 states, and is the largest orthopaedic registry with over 300,000 procedures, 565 hospitals, and 4,200 surgeons. AJRR collects Level I (patient, hospital, surgeon, and procedure info) and some Level II (patient risk factors, co-morbidities, post-operative complications, and surgical approaches) data on patients, surgeons, medical devices, and revision complications reported under the procedural codes for primary hip and knee arthroplasty. AJRR also has a mechanism in place for orthopaedic professionals to submit their Physician Quality Reporting System (PQRS) data to CMS through our Qualified Clinical Data Registry (QCDR). AJRR initially was designated a QCDR in FY 2014, and was successfully re-designated this year.

AJRR wishes to thank CMS for moving ahead rapidly to implement the QCDR program. AJRR believes that clinical data registries represent the future of quality measurement and performance improvement, so successful establishment and implementation of the QCDR program has the potential to encourage greater provider participation in meaningful quality improvement activities.

Use and Disclosure of Claims Data

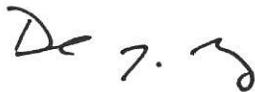
AJRR is pleased that under Section 105 of The Medicare Access and CHIP Reauthorization Act of 2015 (MACRA), beginning July 1, 2016, the Secretary of HHS must provide Medicare claims data upon request to qualified clinical data registries (QCDRs) for the purpose of linking such claims data with clinical outcomes data to perform risk-adjusted, scientifically valid analysis and research to support quality improvement.

AJRR respectfully requests that QCDRs be provided access to Medicare claims data, as required by law, promptly on July 1, 2016 and that the process for obtaining these data be convenient, timely, and affordable. In order to ensure that the CMS process to give access to Medicare claims data is appropriate, AJRR asks CMS to issue guidance on how the Medicare claims data will be accessed and to publish final rules for QCDR application well before the July 2016 time frame.

AJRR has examined the *Qualified Entity Program* process and suggests that CMS use the same model for the new QCDR Medicare claims data request process required under MACRA. The Qualified Entity process is already established and draft documents are easily accessible through the ResDAC portal. In an effort to make Medicare claims data available promptly and efficiently, AJRR suggests that CMS allow QCDRs to access Medicare claims data through this Qualified Entity Program claims request process. AJRR strongly supports the idea that CMS work closely with AJRR and other QCDRs throughout the guidance and rule-making process. This is very important to AJRR as we start to collect and report patient reported outcomes and health care moves to a value based system.

The AJRR appreciates this opportunity to provide comments on the *Request for Information Regarding Implementation of the Merit-Based Incentive Payment System, Promotion of Alternative Payment Models, and Incentive Payments for Participation in Eligible Alternative Payment Models*. We look forward to continuing to work with CMS to provide guidance and input on issues related to the Qualified Clinical Data Registry program. If you have questions regarding our comments, please do not hesitate to contact our Executive Director, Jeffrey P. Knezovich, CAE at (847) 430-5036 or at knezovich@ajrr.net.

Sincerely,



Daniel J. Berry, MD
Chair
American Joint Replacement Registry

cc: Jeffrey P. Knezovich, CAE, Executive Director
David G. Lewallen, MD, Medical Director