



August 21, 2017

Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-5522-P
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850

RE: Medicare Program: CY 2018 Updates to the Quality Payment Program. 42 CFR Part 414 (CMS-5522-P) RIN 0982-AT13

Dear Administrator Verma:

I am writing to you on behalf of the members of the National Association of Social Workers (NASW), the largest and oldest professional organization of social workers in the United States with a membership of 130,000. We appreciate the opportunity to comment on the Centers for Medicare and Medicaid Services (CMS) proposed rule CY 2018 Updates to the Quality Payment Program, 42 CFR Part 414 (CMS-5522-P). NASW submits the following comments for your consideration.

Quality Payment Program Strategic Objectives

NASW supports the strategic objectives of the Quality Payment Program and the proposed seventh objective that ensures operational excellence in program implementation and ongoing development. There were operational problems in the program implementation of the Physician Consortium for Performance Improvement that negatively impacted clinical social workers. We appreciate your attention in minimizing the burden of participation in the Quality Payment Program, and improving administrative and operational procedures as we move forward to 2018.

Small Practices

NASW commends CMS for recognizing small practices which often provide a lower volume of services to Medicare beneficiaries as compared to medical specialties. Clinical social workers in independent practice work in small practices and would benefit from the exemption proposal to increase the low volume threshold to less than or equal to \$90,000 in Medicare Part B allowed charges or less than or equal to 200 Medicare Part B patients. NASW is concerned there is no positive payment increase for providers who meet this exemption and recommends some type of payment update be considered to keep up with inflation.

In addition, NASW supports the hardship exception from the advancing care information performance category for eligible providers in small practices. We are pleased about the provision of bonus points to the final scores of the Merit-based Incentive Payment System (MIPS) for eligible providers in small practices.

Virtual Groups

NASW supports the introduction of virtual groups into the Quality Payment Program which is a beneficial one, especially for providers in small practices. It requires a small practice to use an electronic health record and many small practices have not converted to the use of technology due to its expense. NASW encourages CMS to provide financial incentives to aid small practitioners, especially non-physician practitioners, in obtaining an electronic health record just as was done for physicians to help them defray the cost of an electronic health record.

Thank you for considering NASW comments. We look forward to other opportunities to make comments on regulations concerning quality payment. If you have any questions, please do not hesitate to contact me at 202-336-8200 or naswceo@socialworkers.org

Sincerely,

A handwritten signature in cursive script that reads "Angelo M. McClain".

Angelo McClain, PhD, LICSW
Chief Executive Officer