



November 11, 2021

Medicare Payment Advisory Commission
425 Eye Street NW
Suite 701
Washington, DC 20001

Dear Chairman Chernew, Executive Director Mathews, and MedPAC Commissioners and Staff:

The undersigned members of the Physician Clinical Registry Coalition (the “Coalition”) respectfully request the opportunity to virtually meet with representatives of the Medicare Payment Advisory Commission (“MedPAC”) to discuss ways in which clinical data registries can be leveraged to meet the current and future needs of the health care system and to optimize patient care. The Coalition is a group of medical society-sponsored clinical data registries that collect and analyze clinical outcomes data to identify best practices and improve patient care. We are committed to advocating for policies that encourage and enable the development of clinical data registries and enhance their ability to improve quality of care through the analysis and reporting of clinical outcomes. Most of the members of the Coalition meet the definition of clinician-led clinical data registry under the 21st Century Cures Act and have either been approved as Qualified Clinical Data Registries (“QCDRs”) or are working towards achieving QCDR status.

Registries are uniquely positioned to drive the health care system forward and play an important role in the quality-based payment paradigm. Registries report medical and clinical data to the Centers for Medicare and Medicaid Services (“CMS”) on behalf of clinicians for purposes of the Merit-based Incentive Payment System (“MIPS”) and for more general patient and disease tracking. The measures developed by QCDRs and clinician-led clinical data registries are meaningful and relevant to participating providers and their patient populations, making them an ideal partner to CMS with its MIPS Value Pathway strategy and future value-based payment models.

Registries promote, facilitate, and conduct medical research and improve quality of healthcare by providing timely and actionable feedback to practitioners on their performance, which enhances quality improvement opportunities. Registries are major sources of real-world evidence, including collecting patient-reported outcomes data. Registries can be used to research outcomes based on alternative treatments paths and support evidence-based guidelines development. Registries also allow for patient-centered, statistically valid and timely inter-practice and national benchmarking and comparisons. Registry data may be used to identify best practices and most effective treatments, determine the relative value of physician services, and identify deficiencies or disparities in care that require corrective action.

In addition, registries and their robust data sets can enable quicker and less expensive randomized clinical trials, longitudinal studies, and other observational studies. Registries support innovation and access to care for patients by streamlining and decreasing the costs of clinical trials for the approval of investigational new drugs or devices by the Food and Drug Administration.

CMS should expand its use of registries and employ them in a more robust manner to enhance value-based programs. As MedPAC continues to examine current Medicare policies and offer recommendations to improving quality of care, we encourage MedPAC to consider the power of registries as it forms its recommendations for health care policy. We would greatly appreciate the opportunity to virtually meet with you to further discuss the value of registries. Please contact Rob Portman or Leela Baggett at Powers Pyles Sutter & Verville, PC (Rob.Portman@PowersLaw.com or Leela.Baggett@PowersLaw.com) if you would be interested in meeting with Coalition members.

Sincerely,

American Academy of Dermatology Association
American Academy of Neurology
American Academy of Ophthalmology
American Academy of Otolaryngology – Head and Neck Surgery
American Academy of Physical Medicine and Rehabilitation
American Association of Neurological Surgeons
American College of Emergency Physicians
American College of Gastroenterology
American College of Radiology
American College of Rheumatology
American Society for Gastrointestinal Endoscopy
American Society of Anesthesiologists/Anesthesia Quality Institute
American Society of Nuclear Cardiology
American Society of Plastic Surgeons
American Urological Association
Association for Clinical Oncology
Center for Professionalism and Value in Health Care
College of American Pathologists
Congress of Neurological Surgeons
Society of Interventional Radiology
Society of NeuroInterventional Surgery
The Society of Thoracic Surgeons