

# Key Advocacy Successes 2018-2019

ACMS set out to...	To accomplish that, ACMS...
<p><i>Protect Access to Skin Cancer Care</i></p>	<ul style="list-style-type: none"> <li>• Lobbied on key issues, including access to skin cancer care and treatment, during the 2018 ACMS Advocacy Conference in Washington, DC</li> <li>• Engaged in a face-to-face discussion with representatives from URAC to discuss its network adequacy standards and how Mohs surgeons can continue to influence URACs accreditation activities during the 2018 ACMS Advocacy Conference</li> <li>• Engaged in collaborative efforts with like-minded stakeholders to ensure access to specialty medicine, including skin cancer care and treatment               <ul style="list-style-type: none"> <li>○ As a member of the Alliance of Specialty Medicine, met with CMS Principal Deputy Administrator and Director of the Centers for Medicare, Demetrios Kouzoukas, to make the following requests:                   <ul style="list-style-type: none"> <li>▪ Require Medicare Advantage plans identify physician specialties and subspecialties using the National Uniform Claims Committee (NUCC) Healthcare Provider Taxonomy code set for purposes of network adequacy calculations</li> <li>▪ Require transparency and standardization in utilization management practices by Medicare Advantage plans, as well as hold plans accountable, and exercise ongoing oversight</li> <li>▪ Improve the Medicare Advantage Quality Rating System, or “Star Ratings” program, by adding new stars measures that consider network adequacy, as well as add a survey of physician’s experiences</li> </ul> </li> <li>○ Participated in the 2018 Alliance of Specialty Medicine Legislative Conference</li> <li>○ Co-signed several letters to legislators and regulators seeking improvements in network adequacy and related issues</li> </ul> </li> </ul>
<p><i>Preserve Physician-Office Compounding</i></p>	<ul style="list-style-type: none"> <li>• Addressed physician-office compounding with policymakers during the 2018 ACMS Advocacy Conference in Washington, DC and 2018 Alliance of Specialty Medicine Legislative Conference</li> </ul>

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- Engaged in a discussion with representatives from the US Food and Drug Administration (FDA) and US Pharmacopeia (USP) on physician-office compounding activities, including the potential to leverage ACMS' MohsAIQ registry during the 2018 ACMS Advocacy Conference
- Supported the efforts of the ACMS nominee, Allison Vidimos, RPh, MD, as an expert consultant to the USP Compounding Expert Committee
- Participated in the AMA Compounding Coalition, including meetings convened by the AMA on physician-office compounding with USP leadership
  - Following comments made by the allergy/immunology representative during a USP CEC meeting, ACMS encouraged USP staff and leadership to consider alternatives to addressing buffered lidocaine (i.e., through a separate monograph based on a modified USP 51 testing scenario)
- Allison Vidimos, RPh, MD, representing ACMS, participated in an AADA-convened meeting with USP, FDA, and the Centers for Disease Control (CDC) leadership, engaging in a robust dialogue on compounding buffered lidocaine and the impact on Mohs surgery and other dermatologic services
- Submitted written comments on a second draft of the USP General Chapter <797> that would exempt "administration" of certain compounds (e.g., buffered lidocaine) to 1-hour, far too short for Mohs procedures, which extend beyond this timeframe
- Engaged in collaborative efforts with like-minded stakeholders to preserve patient access to physician-office compounded medicines
  - Participated in the AMA Compounding Coalition
  - Participated in the Alliance of Specialty Medicine
  - Served on the American Academy of Dermatology Association (AADA) Compounding Workgroup

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<p><i>Maintain the In-Office Ancillary Services Exception of the Stark Law</i></p>	<ul style="list-style-type: none"> <li>• Collaborated with a broad coalition of physician stakeholders to prevent passage of legislation that would hinder patient access to comprehensive skin cancer care and treatment by limiting Mohs surgeons ability to provide pathology services in the office</li> </ul>
<p><i>Drive Meaningful Quality Improvement and Efficient Resource Use</i></p>	<ul style="list-style-type: none"> <li>• Secured the nomination of Howard Rogers, MD, PhD, to the MACRA Episode-Based Cost Measure Clinical Subcommittee – Dermatologic Disease Management</li> <li>• Engaged in collaborative efforts with like-minded stakeholders to address ongoing concerns with the Quality Payment Program (QPP), including the Merit-based Incentive Payment System (MIPS) and Advanced Alternative Payment Models (AAPMs)             <ul style="list-style-type: none"> <li>○ As a member of the Alliance of Specialty Medicine, met with CMS Principal Deputy Administrator and Director of the Centers for Medicare, Demetrios Kouzoukas, to make the following requests to improve MIPS and specialty engagement in AAPMs:                 <ul style="list-style-type: none"> <li>▪ Provide participation data in MIPS, by specialty, as part of the annual notice and comment rulemaking for the QPP</li> <li>▪ Remove the “all-or-nothing” aspect of the Promoting Interoperability (PI) category by allowing eligible clinicians to select from a menu of measures that are most appropriate for their practice and patient population</li> <li>▪ Simplify MIPS scoring so eligible clinicians and practice staff can have a more accurate understanding of how success can be achieved given various levels of participation</li> <li>▪ Provide participation data in APMs, by specialty, as part of the annual notice and comment rulemaking for the QPP</li> <li>▪ Establish pathways for specialists to meaningfully engage in the Medicare ACO program</li> <li>▪ Provide ACOs with technical assistance that would allow them to appropriately analyze clinical and administrative data, improving their understanding of the role specialists could play in addressing complex</li> </ul> </li> </ul> </li> </ul>

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	<p>health conditions, such as preventing acute exacerbations of comorbid conditions associated with chronic disease</p> <ul style="list-style-type: none"><li>▪ Closely examine the referral patterns of ACOs and establish benchmarks that will foster an appropriate level of access to and care coordination with specialists, in addition to collecting feedback from beneficiaries on access to specialty care</li></ul> <ul style="list-style-type: none"><li>• Through the Alliance of Specialty Medicine, provided substantive feedback to CMS on the 2019 QPP</li><li>• Met with the Medicare Payment Advisory Commission (MedPAC) to discuss the value of specialty medicine and impact of its recommendations to eliminate MIPS and replace with a voluntary value program, as well as shift payments from specialty to primary care</li><li>• Engaged in collaborative efforts with like-minded stakeholders to improve meaningful participation in the QPP and MIPS<ul style="list-style-type: none"><li>○ Along with other Alliance of Specialty Medicine organizations, participated in multiple meetings with key Congressional committee staff on needed technical corrections and improvements that would help promote specialty participation and foster a sustainable MIPS program</li><li>○ Along with other Alliance of Specialty Medicine organizations, participated in a meeting with the Medicare Payment Advisory Commission (MedPAC) on the importance of the MIPS program to specialty physicians</li><li>○ Participated in the Alliance of Specialty Medicine Physician Policy Roundtable with House Ways &amp; Means Health Subcommittee Chairman Peter Roskam (R-IL-6<sup>th</sup>)</li><li>○ Co-signed several letters to legislators, regulators, and MedPAC urging ongoing improvements to the QPP, to include additional improvements to MIPS and increased alternative payment models (APMs) options for specialty physicians</li></ul></li></ul>
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<p><i>Increase Awareness of the Growing Skin Cancer Epidemic</i></p>	<ul style="list-style-type: none"><li>• Participated in the joint 2018 American Academy of Dermatology and Capitol Hill Skin Cancer Caucus Skin Cancer Prevention Health Fair &amp; Screening</li><li>• Addressed the skin cancer epidemic with policymakers during the 2017 ACMS Advocacy Conference in Washington, DC, encouraging every Congressional office to join the Congressional Skin Cancer Caucus</li><li>• Participated in the March 219 PASS Coalition Fly-in, sharing concerns about a recent proposed rule that would limit consumer access to sunscreens despite a wealth of data on their safety and effectiveness, thus potentially increasing an already growing epidemic of skin cancers</li></ul>
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