

# REQUEST FOR PUBLIC COMMENTS

The Physician-Focused Payment Model Technical Advisory Committee (PTAC) requests public input on the following topics:

- a new process we have established for providing initial feedback to individuals and stakeholder entities who submit proposals for physician-focused payment models (PFPMs);
- the requirements we have previously established for submission of such proposals; and
- the processes we have followed for reviewing and making recommendations on those proposals.

We welcome individuals to provide written input via email sent to [PTAC@hhs.gov](mailto:PTAC@hhs.gov) or by U.S. mail addressed to Angela Tejada, ASPE, 200 Independence Avenue, SW, Washington, DC 20201.

## **New Process for Initial Feedback**

On May 15, 2018, we released a document entitled “Implementing New Authority Provided by the Bipartisan Budget Act of 2018” which describes the process we plan to use to provide “initial feedback” to submitters of proposed models. We welcome any comments on ways to improve this process. We are particularly interested in comments on the following issues:

- Do you feel that the process for providing feedback that we have defined will be valuable for those submitting proposals?
- Are there different or additional ways that we could provide feedback that would be helpful to stakeholders while remaining consistent with the statutory language?
- The process we have developed requires submission of a complete proposal in order to receive feedback. Are any aspects of the proposal requirements problematic?
- Is there anything about the feedback process that would make someone less likely to submit a proposal? Should those submitting proposals have the option to choose not to receive any feedback?

## **Existing Processes and Requirements**

PTAC’s requirements for submission of proposals are included in the documents “Physician-Focused Payment Models: PTAC Proposal Submission Instructions” and “Instructions for Letter of Intent Submissions” that are posted on the ASPE PTAC website. We have been using these requirements and processes for the past 18 months, and we would welcome feedback on how well they are working and any suggestions on how they might be improved.

We welcome comments both from those who have already submitted proposals as well as those who are considering submitting proposals, those who are advising others as to whether to submit a proposal, those assisting others to develop a proposal, or those more generally interested in helping PTAC carry out its responsibilities as efficiently and effectively as possible within its statutory mandate.

We are particularly interested in comments on the following issues.

- We require that a Letter of Intent be submitted at least 30 days prior to submission of a proposal. We have received a number of letters of intent for which no proposal has ever been

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submitted. Is the requirement for a Letter of Intent helpful or problematic for applicants? Are any of the information items requested in the Letter of Intent unclear or problematic? Do you have any suggestions for changing the content or timing of the Letter of Intent or for improving the process of submitting the Letter of Intent? Is there any type of feedback on the Letter of Intent that would be helpful for applicants to receive?

- We require that the proposal include both a Model Description section (in order to provide us with a coherent overview of the model) and also sections responding to each of the Secretary's Criteria (since we must evaluate the proposal against each of those criteria). Does this requirement make it easier or more difficult to prepare the proposal? Are there ways that we could better explain what we are looking for in these two sections?
- Under each of the criteria, we list a series of questions that are described as optional information items that should only be included if relevant. Are these questions helpful in preparing a proposal? Do you have any recommendations for additions, deletions, or changes that we should make to these questions or to the information we request be submitted with proposals?
- We have designated three of the Secretary's criteria as "high priority" and we have indicated that we are more likely to recommend proposals that meet each of those criteria. Do you agree that those three criteria should be given higher priority consideration than the others? Is it clear what proposals need to contain to demonstrate that they meet these criteria?
- We have required that the main body of the proposal be limited to 25 pages and that all essential information be contained there. In many cases, after reviewing the proposal, we have asked applicants for responses to questions that involve submission of additional information. Is this approach helpful or problematic? Do you have any suggestions for how we can more efficiently get the most important information we need to make good decisions?
- Is the Appendix in the Proposal Submission Instructions which describes "Characteristics of PFPs Likely to be Recommended by PTAC" helpful in developing proposals? Would you recommend that we change or delete any of the characteristics specified in the Appendix, and would you recommend any additional characteristics that we should add?
- What are the biggest challenges or barriers in preparing a proposal?
- After verifying completeness, each proposal is reviewed by a Preliminary Review Team (PRT) with three members, one of whom must be a physician. The PRT then requests written and verbal responses to questions it has about the proposal. Do you have any concerns about this process or suggestions for improving it?
- PTAC public meetings are the only opportunities that all of the PTAC members have to discuss a proposal and to ask questions of the proposer before voting on the extent to which the proposal meets the Secretary's criteria and making an overall recommendation to the Secretary. Do you have any concerns about the public meeting process or suggestions for improving it?
- We have strived to review proposals as quickly as we can, given the limitations we have as volunteers. Do you have any suggestions for ways that we can make the review process more efficient or less burdensome?
- Is the information that we have provided in our reports to the Secretary helpful to those who are considering submitting proposals?