



August 18, 2017

Seema Verma, MPH, Administrator
Center for Medicare and Medicaid Services
Department of Health and Human Services
P.O. Box 8013
Baltimore, MD 21244-8013

Reference CMS-5522-P

Dear Ms. Verma,

The Society for Academic CME (SACME) is in strong support of the inclusion of continuing medical education (CME) as an improvement opportunity under the Quality Payment Program's (QPP's) Merit-Based Incentive Payment System (MIPS) contained in the CMS proposed rule for QPP's second year. The field of CME has already embraced the learning and professional development associated with these types of activities, as demonstrated by existing requirements promulgated by the American Medical Association for accredited performance improvement CME activities (<https://www.ama-assn.org/education/performance-improvement-continuing-medical-education-pi-cme>). As an organization that promotes the highest value in patient care and health of the public through the scholarship of continuing medical and interprofessional education, SACME has advocated for CME that addresses quality and safety gaps, has measurable aims and appropriate interventions for improvement, is assessed through objective performance data, and involves the active participation of physicians. Research clearly demonstrates that these types of interventions are effective in changing practice and healthcare outcomes.

Physicians and other healthcare professionals are under considerable regulatory and administrative burdens, resulting in burnout and decreased clinical productivity. The ability to participate in meaningful CME that meets requirements for licensure and hospital privileges, supports maintenance of certification, and is recognized through payment incentives is a tremendous step forward in aligning efforts to advance patient care and improve professional satisfaction. We commend CMS for putting forward such an important proposal and we look forward to advancing the field of CME to continuously improve the outcomes of our educational efforts.

Sincerely,

Ajit K. Sachdeva, MD, FRCSC, FACS
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