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February 16, 2024

VIA ELECTRONIC MAIL

Partnership for Quality Measurement
PQMSupport@battelle.org

Re: MUC2023-212 Level I Denials Upheld Rate Measure

To Whom It May Concern,

On behalf of the American Academy of Otolaryngology-Head and Neck Surgery (AAO-HNS)¹, I am contacting you regarding the new recommended measure for the Medicare part C & D Star Ratings programs which was recommended on CMS' 2023 Measures Under Consideration (MUC) list.

The AAO-HNS is supportive of this newly proposed measure. We strongly believe that Medicare Advantage plans should be transparent in their process and forthcoming with information regarding denials, appeals and prior authorization issues. These issues tie directly to patient care and the ability for seniors to receive the care that they need in a timely manner.

CMS made efforts to move the needle on this topic in its recent interoperability and prior authorization final rule - but did not go as far as requiring this type of information to be reported, this proposed measure takes that extra step. In addition to taking the extra step it allows consumers the opportunity to educate themselves based on publicly produced information and holds the Medicare Advantage plans accountable by connecting this to their star ratings.

¹ The AAO-HNS is the world's largest organization representing specialists who treat the ear, nose, throat, and related structures of the head and neck. The Academy represents approximately 13,000 otolaryngologist-head and neck surgeons who diagnose and treat disorders of those areas.

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We appreciate the opportunity to provide comment on this important effort and the recommendations from the Partnership for Quality Measurement (PQM.) We believe that by continuing to increase the transparency requirements for payers this will only improve the process for clinicians and therefore increase timely patient care and access. We would welcome the opportunity to discuss this, and any other policy as needed. Should you have any questions, please contact healthpolicy@entnet.org

Sincerely,



James C. Denny III, MD
Executive Vice President and CEO

