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January 5, 2021

Seema Verma
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1734-P
Mail Stop C4-26-05,
7500 Security Boulevard,
Baltimore, MD 21244-1850

Re: Melanoma Resection Episode based Cost Measure

Submitted electronically via Qualityforum.org

Dear Administrator Verma,

The American Academy of Dermatology Association (AADA) represents close to 14,000 dermatologists nationwide. We are writing to provide feedback on the Melanoma Resection Episode based Cost measure. The AADA is committed to excellence in the medical and surgical treatment of skin disease; advocating for high standards in clinical practice, education, and research in dermatology and dermatopathology; and driving continuous improvement in patient care and outcomes while reducing the burden of disease

We appreciate the opportunity to provide feedback on the Melanoma Resection Episode base cost measure for the Merit-based Incentive Payment System (MIPS) program. The Melanoma Resection cost measure is of significant interest to dermatologists. Currently, there are no cost measures available for Dermatologists under the MIPS program. The Melanoma Cost measure would give them the opportunity to fully participate in the MIPS program.

Therefore, the AADA supports adopting the melanoma cost measure into the MIPS program. We believe that the measure specifications listed achieve the goal of accurately measuring the cost of

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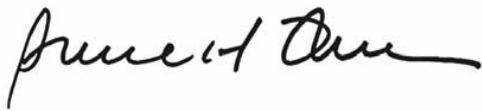
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melanoma resection that is within the control of the attributed clinician.

Thank you for your consideration of our recommendations and comments on the Melanoma Cost measure. If you have any questions, please contact Helen Olkaba, Assistant Director, Healthcare Economics at holkaba@aad.org or 202-712-2612.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce H. Thiers". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bruce H. Thiers, MD, FAAD
President, American Academy of Dermatology Association