**Multi-State**

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**Learning Health System Collaborative**

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MEMO

To: Participants in the Milbank Memorial Fund Multi-State Learning Health System Collaborative and Interested Parties

From: Christopher F. Koller, President, Milbank Memorial Fund

Date: October 14, 2013

Re: Response to proposed Medicare Payment Rule (**Federal Register**/Vol. 78, No. 139/Friday, July 19, 2013/Proposed Rules, pages 43337-43342) and implications for the CMMI MAPCP and CPCI programs

Thank you for your responses to Lisa Dulsky Watkins as she helps organize a common position around these developments. The collective response to Lisa has been clear that you share a common desire to develop your primary care infrastructure in your state and a need to express your concerns to CMS about how these developments could damage those efforts. I am writing you to identify four particular steps to take in the next four weeks:

1. A draft letter from your Governor to Secretary Sebelius and Administrator Tavenner is attached. Please work with your Governor’s staff to send an appropriately modified version of this letter to them.
2. As conveners of your own state-based collaboratives, letters to CMS expressing your concerns are also valuable and should be sent. Separate letters or one co-signed by your collaborative participants will also be significant. A letter sent by your colleagues in Michigan and a draft set of comments from Vermont are attached.
3. You may consider informing your Congressional delegation staff of your concerns and the actions you are taking.
4. Finally, please keep Lisa informed of the actions you are taking. Fifteen states, or even more, working in concert to express concerns is a powerful action for CMS.

Lisa estimates that there is a four week window here. It is important to note that these efforts are simply asking for Executive Branch actions permitted within existing legislation. Thanks for this work, and all your efforts on behalf of primary care providers and the communities they serve.