

*Note: The below language is a suggestion. Submitters are encouraged to adapt this template to their unique practice and situation.*

On behalf of **[INSERT PRACTICE NAME]**, we believe that CMS has inappropriately attributed costs for patients with diabetes to the diabetes episode-based cost measure to our practice. This measure should be attributed to the physician taking care of the patient's overall diabetes condition, and not the ocular complications. Retina specialists are integral members of the care team for patients with diabetes providing ongoing screening and more intensive interventions if the patient develops complications of diabetes, such as diabetic retinopathy or diabetic macular edema. However, we do not manage the underlying disease, nor do we perform or prescribe the services and medications included in the diabetes episode-based cost measure's attribution specifications. Per the rationale above, we request that CMS exclude our practice from the diabetes episode-based cost measure and reweight the cost performance category to the quality performance category. CMS already corrected this error for individual ophthalmologists but did not apply this to ophthalmology groups.