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ABC MISSION:

To promote the prevention and treatment of cardiovascular disease, including stroke, in Blacks and other minorities and to achieve health equity for all through the elimination of disparities.

September 12, 2026

Dr. Mehmet Oz, Administrator

Centers for Medicare & Medicaid Services

Department of Health and Human Services

Attention: CMS-4208-P

P.O. Box 8013

Baltimore, MD 21244-8013

RE: Medicare and Medicaid Programs; CY 2026 Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment and Coverage Policies; Medicare Shared Savings Program Requirements; and Medicare Prescription Drug Inflation Rebate Program

Dear Administrator Oz,

On behalf of the Association of Black Cardiologists (ABC), we appreciate the opportunity to provide comments on the proposed rule related to the *Medicare and Medicaid Programs; CY 2026 Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment and Coverage Policies; Medicare Shared Savings Program Requirements; and Medicare Prescription Drug Inflation Rebate Program*. We commend and thank CMS for its efforts to advance cardiac health, combat heart failure, and address administrative inefficiencies that have led to increased cost and lower quality care. Our comments below focus on the proposed Ambulatory Specialty Model (ASM).

About ABC

Since our founding 50 years ago, the Association of Black Cardiologists (ABC) has grown to include over 2,000 members across the cardiology community. ABC strives to promote the prevention and treatment of cardiovascular disease in Black and minority communities by eliminating gaps in our healthcare system. We work to close these gaps through advocacy that speaks to the inconsistent application of evidence-based care in medicine, by promoting a proportional representation of minority populations in clinical trials, by supporting patient access and adherence, and by combating barriers to existing and emerging technologies.

ABC Comments on ASM

ABC expresses strong support for the establishment of ASM as a mandatory model focused on the care provided by select specialists to Medicare beneficiaries with the chronic conditions of heart failure and low back pain. ABC agrees ASM is a critical step for CMS to address the chronic illness burden while enhancing care quality and reducing costs.

As CMS notes, chronic conditions constitute a large portion of total Medicare Part A and B spending. Heart failure alone accounts for 3.5 percent of total Medicare Part A and B spending. The proposed ASM will incentivize greater collaboration and coordination of care between clinicians. This will improve care and reduce costs. Additionally, the mandatory nature of the model increases transparency, increases competition, and reduces high cost, low-value care – a common affliction for patients with heart disease and other chronic illnesses often face. This innovative model also goes beyond the typical reactive system of care which often forces patients to address health challenges as they come and instead, encourages care providers, and in turn their patients, to have regular, preventative primary care and screenings for chronic conditions.

By implementing this model, CMS can improve quality of care, reduce costs, and decrease the burden of chronic diseases such as heart failure.

However, we encourage CMS to make sure participation in the ASM remains voluntary. Given the diverse operational, financial, and staffing capacities across specialty practices, particularly those serving underserved communities, a mandatory model could unintentionally burden providers who lack the infrastructure to meet new requirements. Voluntary participation will allow interested and capable practices to engage in the model, test innovations, and demonstrate value without deterring participation from specialties operating in resource-constrained settings. This approach will support iterative learning and foster broader stakeholder engagement over time.

Thank you for your time and attention in this matter. Please do not hesitate to contact Kennedy Peoples at kpeoples@abc cardio.org with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cass', with a long horizontal flourish extending to the right.

Cassandra McCullough, MBA
Chief Executive Officer, Association of Black Cardiologists