September 28, 2022

The Honorable Nancy Pelosi Speaker U.S. House of Representatives H-232, The Capitol Washington, DC 20515

The Honorable Charles Schumer Majority Leader U.S. Senate S-221, The Capitol Washington, DC 20510 The Honorable Kevin McCarthy Republican Leader U.S. House of Representatives H-204, The Capitol Washington, DC 20515

The Honorable Mitch McConnell Republican Leader U.S. Senate S-230, The Capitol Washington, DC 20510

Re: Extend Medicare Advanced Alternative Payment Model (APM) Incentive Payments

Dear Speaker Pelosi, Leader McCarthy, Leader Schumer, and Leader McConnell:

On behalf of the over 800 undersigned physician and health care associations, health systems, provider practices, and accountable care organizations (ACOs), thank you for your leadership to ensure physicians and other clinicians have adequate resources to care for the health of the U.S. population. As Congress considers priority end-of-year legislation, we ask that you bolster and advance the ongoing transition to value-based health care by extending Medicare's 5 percent Advanced Alternative Payment Model (APM) incentive payments authorized under the Medicare Access and CHIP Reauthorization Act (MACRA).

As you know, a key aim of MACRA was to encourage physicians and other health care providers to transition into Advanced APMs. To help achieve this important goal, MACRA provided 5 percent incentive payments to facilitate participation in these models by physicians and other clinicians, including those in primary care, cancer care, kidney disease care, and more. A crucial benefit of Advanced APMs is that they are rooted in the principle of accountability where financial performance is linked to quality and outcomes, rather than volume.

Absent congressional intervention, the ability for clinicians to qualify for the incentive payments is set to expire at end of 2022. This development would reduce reimbursements and serve as a disincentive to nearly 300,000 clinicians working to improve the quality and cost-effectiveness of care for millions of Medicare beneficiaries. These physicians and other health care providers have made laudable efforts to transform and improve the health care system by participating in Advanced APMs. Ending these important incentive payments would discourage future participation in models that have seen growing uptake in recent years.

The incentive payments not only encourage physicians and other health care providers to enter models, but also provide additional resources that can be used to expand services beyond traditional fee-for-service. For example, ACOs, the predominant type of Advanced APM, have used these incentives to fund wellness programs, pay for patient transportation and meals programs, reduce cost sharing for beneficiaries, and hire care coordinators. These are services that are not typically reimbursed through Medicare but improve patient health outcomes and wellbeing.

Successful transition to Advanced APMs means that physicians and other health care providers must invest in workflow improvements, digital health tools, care coordinators, data analytics, quality measurement systems, transitional care services, and innovative patient engagement methods. On average ACOs spend between \$1 to \$2 million per year on these types of advanced care delivery tools.

The Advanced APM incentive payments undoubtedly help them afford some of these investments, allowing them to reinvest in care transformation initiatives to benefit patients.

Advanced APMs are transforming how patients in traditional Medicare receive care. It's also clear these payment system reforms have been a good financial investment for the government, generating cost savings for the Medicare Trust Funds and improving patient outcomes. In the last decade, ACOs have generated more than \$16 billion in gross savings and produced higher quality care for patients. Evidence also shows ACOs participating as Advanced APMs have generated higher net per beneficiary savings compared to those in non-advanced tracks. In 2020 alone, ACOs generated \$4.8 billion in gross savings and \$2.1 billion in net savings for CMS, which is a strong return on the investment of roughly \$613 million CMS paid clinicians in Advanced APM incentive payments. Moreover, the growth of APMs has produced a "spill-over" effect on care delivery across the nation, slowing the overall rate of growth of health care spending.

In recognition of our commitment to advancing Medicare's transition to value-based care, we urge you to include Section 4 of the Value in Health Care Act (H.R. 4587) in any end-of-year legislative package. This bipartisan legislation would extend the current 5 percent Advanced APM incentive payments and give CMS the authority to adjust the thresholds to qualify for the incentive payments, which are scheduled for steep increases under current law. These two crucial policy changes will better recognize physicians and other health care providers for their Advanced APM arrangements across all payers, including Medicare Advantage plans, and types of models while gradually increasing the qualifications.

We ask you to advance this important legislation, which will give our organizations the flexibility and financial security needed to innovate care, improve the health of our populations, and lower health care costs.

We appreciate your consideration of this matter.

Sincerely,

Alliance for Technology Driven Health American Academy of Family Physicians American College of Physicians American Medical Association **AMGA** America's Essential Hospitals America's Physician Groups Association of American Medical Colleges Association of Community Cancer Centers Health Care Transformation Task Force **Medical Group Management Association** National Association of ACOs National Rural Health Association Partnership to Empower Physician-Led Care Premier Inc **Primary Care Collaborative** Value Based Care Coalition

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Aledade CA MSSP 2021 Enhanced

Aledade CA MSSP 2023

Aledade CA MSSP Community Health Center

Aledade CA MSSP Santa Barbara Enhanced

Aledade Delaware ACO

Aledade Florida Central ACO

Aledade GA MSSP Enhanced

Aledade Hill Physicians 2023 MSSP

Aledade Kansas ACO

Aledade KS MSSP Community Health Center Enhanced

Aledade LA MSSP 2022 Enhanced

Aledade Louisiana ACO

Aledade MD MSSP Enhanced

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Aledade MO MSSP 2022

Aledade MS MSSP Community Health Center Enhanced

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Aledade NJ MSSP Enhanced

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Aledade PA MSSP Legacy + Gateway Enhanced

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Osceola Women & Family Medicine Specialists, Florida

Oza Family Care and Wellness Center, Texas

Panther Creek Medical Center, P.A., Texas

Park Nicollet Health Services Accountable Care, Minnesota

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Peachtree Medical Center, Georgia

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Physician Partners, Florida

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Physicians Group Of The Woodlands, Texas

Physicians of Central Florida, LLC

Physicians Treatment Center, Virginia

Pinellas County Primary Care & Hospitalists, PLLC, Florida

Pleasanton Family Medicine, PLLC, Texas

PMA Health, Virginia

Port Lavaca Clinic Associates, P.A., Texas

Potomac Internal Medicine, Virginia

Precision Health Care, LLC, Maryland

Preferred Medical Group (Michigan Healthcare Professionals PC)

Premier Internists (Millennium Medical Group, P.C.), Michigan

Premier Primary Care Physicians PC, Virginia

PremierMED, Florida

Preston Hollow Women's Healthcare, Texas

Prevention Plus Clinic LLC, Louisiana

Prima Medicine, Virginia

Primary Care Alliance, LLC, Florida

Primary Care Center of Clear Lake, Texas

Primary Care Development Corporation, New York, California

Primary Care Partners, Nebraska

Primary Care Specialists of Orlando - Orange Avenue, Florida

Primary Partners Alliance, Florida

Primary Partners, Florida

Prime Care Managers, LLC, Texas

Prime Care Medical Services, LLC, Georgia

Prime MD of Naples PLLC, Florida

Primecare Medical Center, Texas

Prisma Health Upstate Network, South Carolina

Privia Health

Privia Medical Group Central Florida

Privia Medical Group Georgia

Privia Medical Group Gulf Coast

Privia Medical Group Maryland

Privia Medical Group Montana

Privia Medical Group North Texas

Privia Medical Group Tennessee

Privia Medical Group Virginia

Privia Medical Group West Texas

Privia Quality Network Central Florida

Privia Quality Network Central Texas

Privia Quality Network Georgia

Privia Quality Network Gulf Coast, Texas

Privia Quality Network Maryland

Privia Quality Network Tennessee

Privia Quality Network, Virginia

Professional Park Medical Services, Georgia

Progressive Health Care, P.C., Michigan

ProHealth Care, Wisconsin

Prospect Medical Group, Inc., California

Providence, Washington

PSW, Washington

Pucillo Family Practice PA, Texas

Purisima Family Medicine, California

Quality Reviews, New York

Quince Orchard Psychotherapy, LLC, Maryland

Raleigh Adult Medicine (Raleigh Family Practice, P.A.), North Carolina

Raleigh Medical Group (Raleigh Family Practice, P.A.), North Carolina

Rancho Health MSO, California

Redford Clinic (Oakland Medical Group, P.C.), Michigan

Reliance ACO LLC, Michigan

Revere Health, Utah

Rhome Family Practice Clinic, Texas

Ridgeline Physician Services, LLC, Virginia

Rio Grande Health Alliance, Texas

Riverton Clinic - Riverton (Granger Medical Clinic, PC), Utah

Roanoke Partners In Health Pc, Virginia

Robertson Family Medicine, PLLC, Texas

Robin Dale, M.D., L.L.C., Louisiana

Rochester Medical Group (Oakland Medical Group, P.C.), Michigan

Rockbridge Health, Virginia

Rocklin Family Practice & Sports Medicine, California

Rockville Internal Medicine Group, Maryland

Rockville Medical care, Maryland

Rockwell Physicians of Salisbury PLLC, Virginia

Rose Hill Family Physicians, Maryland

Ryan Medical Associates, P.C. (Oakland Medical Group, P.C.), Michigan

San Marcos Family Medicine, Texas

Sarasota Primary Care LLC, Florida

Savii Health, Georgia

Screven Primary Care, LLC, Georgia

Scripps Health, California

Select Physicians Associates, LLC, FL, GA, AL, SC, MI, IL, MS, TN

Seven Corners Medical Center, Virginia

Shah And Associates Family Practice, North Carolina

Shaun Kretzschmar, D.O., P.A., Aledo Family Medicine, Texas

Shepherd Health Management, Texas

Shroff Cardiology & Internal Medicine Clinic, P.A., Texas

Signify Health

Silver Pine Medical Group - Sterling Heights Office, Michigan

Silver Spring Medical Center, LLC, Maryland

Silver State ACO, Nevada

Simple Medicine, South Carolina

Singing River Health System, Louisiana

Slidell Memorial Hospital, Louisiana

Snow Family Medicine Inc., Florida

SoNE Health, Connecticut

Sookdeo Family Medicine PLLC, Florida

South Macomb Internal Medicine (Oakland Medical Group, P.C.), Michigan

South Shore Health, Massachusetts

South Texas ACO Clinical Partners, Texas

South Texas Internal Medicine Associates, Texas

SouthCoast Health, Georgia

Southeast Health Statera Network, Alabama

Southeast Primary Care Partners, LLC, Georgia

Southern Practitioner, Florida

Southside Medical Management, Virginia

Southwest Internal Medicine Specialists, Florida

St. Elizabeth Urgent Care & Family Practice, Texas

St. Joseph's Health, New York

St. Louis Physicians Collaborative, Missouri, Illinois

St. Tammany Emergency Physicians Group LLC, Louisiana

St. Tammany Parish Hospital Service District No 1, Louisiana

Star Family Medicine, Virginia

Steck Medical Clinic, Washington

Stephenville Medical And Surgical Clinic, P.A., Texas

Sterling Physicians (Oakland Medical Group, P.C.), Michigan

Stone Ridge Family Medicine PLLC, Virginia

Stratum ACO, Missouri, Texas

Sullivan County Community Hospital, Indiana

Summit Health, New Jersey, New York, Pennsylvania, Connecticut, Oregon

Summit Medical Group, Tennessee

Sunflower Medical Group P.A., Kansas

Sunmed Group LLC, Florida

Sunshine Family Medicine Center, Florida

Suture Health, Inc., Alabama

Tarrant Medical Associates, LLC, Texas

Tate Medical Associates, LLC, Georgia

TC2, Georgia

Texas Health Care, PLLC

Texas Health Resources

Texas Panhandle Clinical Partners ACO, Texas, New Mexico, Oklahoma

Texas Premier Physicians, P.A.

Texoma ACO, Texas

Texoma Clinical Partners ACO, Texas, Oklahoma

The Center for Health Affairs, Ohio

The Doctor's In, Inc., California

The Family Doctors of Shreveport, Louisiana

The Medical Office of Maximilian Oshalim, MD PLLC, Washington, DC

The MetroHealth System, Ohio

The South Bend Clinic, Indiana

ThedaCare ACO LLC, Wisconsin

Think ACO, LLC, Nebraska

Think Whole Person Healthcare, Nebraska

Thomasville Family Medicine, Georgia

Thrive Family Clinic, LLC, *Texas*

Thrive Primary Care, LLC, Maryland

Tidewater Accountable Care Organization, Virginia

Titus County Hospital District, Texas

Tony Varghese MD PA LLC, Maryland

Tooele Clinic - Tooele (Granger Medical Clinic, PC), Utah

Torrance Memorial Integrated Physicians, California

Torrance Memorial IPA, California

Total Family Care LLC, Maryland

Total Family Healthcare, Florida

Touchstone Internal Medicine & Pediatrics, Texas

Triad HealthCare Network, North Carolina

Tri-County Health Care, Minnesota

Trinity Health, MI, OH, NY, IN, ID, PA, DE, IL, CT, FL, MA

TruCare Medical Practice, LLC, Virginia

Tufts Medicine, Massachusetts

Tumwater Family Practice Clinic, Washington

UC Davis Medical Center, California

UC San Diego Health, California

UHS, NV, CA, FL, TX, DC, SC

UMass Memorial Health, Massachusetts

UNC Senior Alliance/UNC Health, North Carolina

UnityPoint Accountable Care, Iowa

University Internal Medicine, Inc., Rhode Island

University of Chicago Medicine, Illinois

UpStream Healthcare, North Carolina, South Carolina, Virginia

UVAACO, Missouri, Texas

UW Health, Wisconsin

VA Health and Wellness, LLC, Virginia

Valley Family Practice, LLC, Virginia

Vanderbilt University Medical Center, Tennessee

Veranda Medical Group, LLC, Georgia

Vibrant Family Medicine, P.C., Georgia

Vicinia Health, Missouri, Illinois

VillageMD, AZ, CO, FL, GA, IL, IN, KY, MA, MI, NH, NJ, NV, RI, TX

Virginia Family Medicine

Vista Complete Care

Vital Medicine PC (Michigan Healthcare Professionals PC), Michigan

Vraj Medical LLC, Florida

Vytalize Health, New Jersey

Wake Internal Medicine Consultants, Inc., North Carolina

Waldorf Primary Care, Maryland

Wasatch Clinic - Millcreek (Granger Medical Clinic, PC), Utah

Washington Regional Medical System, Arkansas

Weirsdale Family Health Center, Inc, Florida

WellFamily Medicine, Virginia

Wellspring Family Medicine, P.C., Maryland

West Florida ACO

West Jordan Clinic, Bldg. A - West Jordan (Granger Medical Clinic, PC), Utah

West Texas Health, PLLC

Westchester Medical Group, New York

Western ACO, Colorado, Utah

Western Wake Wellness, North Carolina

Westfield Associates in Internal Medicine and Gastroenterology, New Jersey

Westland Clinic (Millennium Medical Group, P.C.), Michigan

Westland Healthcare (Millennium Medical Group, P.C.), Michigan

WholeHealth Medical, Virginia

Wilems Resource Group, LLC, Texas
Winchester Internal Medicine, Inc, Virginia
Winchester Medical Consultants, Virginia
Wingard Urgent Care and Wellness, Georgia
Winter Park Family Practice, Florida
Wong Family Medicine, Maryland
Xin-Nong Li M.D., Inc., California
Yankton Medical Clinic, P.C., South Dakota, Nebraska
Yee Medicine & Pediatric Associates, New Jersey
YELM Family Medicine, Washington
You and Your Health Family Care, Florida
Your MD LLC, Maryland
Zeus Primary Care Associates Ilc, Maryland
Zia ACO, New Mexico