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 NJ MSSP Enhanced

- Aledade Northeastern/Midwest Region MSSP 2023
- Aledade OH MSSP
- Aledade Opportunity MSSP 2022
- Aledade PA MSSP IMG + PMSI
- Aledade PA MSSP Legacy + Gateway Enhanced
- Aledade Pacific Northwest MSSP
- Aledade Primary Care ACO
- Aledade Southeast MSSP 2023
- Aledade TX AZ AR CO UT MSSP Enhanced
- Aledade VA Appalachia MSSP Enhanced
- Aledade VA MSSP
- Aledade Valley Health MSSP 2023
- Aledade West MSSP 2023
- Aledade West Virginia ACO
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- Alief Medical Clinic, Texas
- Allay Primary Care, PLLC, Texas
- Allergy Sinus & Arthritis Clinic, PLLC, Texas
- Allina Health, Minnesota
- Altamonte Family Practice, Florida
- Amarillo Legacy Medical ACO, Texas
- American Multispecialty Group, Inc dba Esse Health, Missouri, Illinois
- America's MDE, Florida
- Amherst Family Practice, Virginia
- AMITA Health ACO, Illinois
- Annandale Family Medicine, Virginia
- Apex Primary Care Apex Primary Care, Florida
- Arbor Medical (Millennium Medical Group, P.C.), Michigan
- Arkansas Health Network, LLC
- Arlington Primary Care, Virginia
- Art Of Medicine PA, Florida
- Ascension Illinois and AMITA Health Care Network
- Ascension, AL, TN, IN, MI, FL, TX, WI, IL, DC, MD, NY, KS, OK
- Associated Family Physicians, Inc., California
- Associates in Internal Medicine, Michigan
- Associates in Internal Medicine, PA, Florida
- AssociatesMD Medical Group, Florida
- Atlantic Accountable Care Organization, New Jersey
- Atlantic Health System, New Jersey
- Atlantic Medical Associates, Virginia
- Auburn Hills Medical Clinic (Oakland Medical Group, P.C.), Michigan
- Auburn Medical Group, Inc., California

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- Endo-Med Clinic SC, Illinois
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- Lifetime Medical Center, Georgia
- Lincoln Medical Associates, California
- Lisa Kim Medical Associates, S.C., Illinois
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- McAuley Health Partners ACO, LLC, Michigan
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- McIntyre Family Medicine, Illinois
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- McLean Internal Medicine, Virginia
- MD Value Care, Virginia
- Med Institute, Inc, California
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- Memorial Health And Wellness, Texas
- Menocal Family Practice, Maryland
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- Mercyhealth, Wisconsin, Illinois
- MercyOne PHSO, *lowa*
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- Mid-Atlantic Collaborative Care, Washington, DC, Maryland, Pennsylvania, Virginia
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Oza Family Care and Wellness Center, Texas Panther Creek Medical Center, P.A., Texas Park Nicollet Health Services Accountable Care, Minnesota PBACO Holding, LLC, Florida Peachtree Cardiology, P.C., Georgia Peachtree Medical Center, Georgia Peninsula Regional Clinically Integrated Network, LLC, Maryland Perisseia Primary Care and Wellness, Georgia Perry Family Practice, LLC, Georgia Personalized Women's Healthcare, Texas Physician Partners, Florida Physician Performance LLC, Massachusetts Physician Quality Partners, North Carolina Physicians ACO, LLC, Florida 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 IIc, *Maryland*Zia ACO, *New Mexico*