



April 27, 2016

VIA ELECTRONIC MAIL

Amy Bassano
Deputy Director
Centers for Medicare & Medicaid Innovation
Centers for Medicare & Medicaid Services
Baltimore, MD

Dear Ms. Bassano:

The Health Care Transformation Task Force (“HCTTF” or “Task Force”)¹ writes to share initial feedback on the new CPC Plus alternate payment model (“APM”). As you know, the HCTTF fully supports the HHS/CMS goal of moving Medicare payments to APMs. We believe the CPC Plus model has the potential to be a major, effective contributor to meeting this goal.

Last evening, the Task Force held its quarterly meeting and discussed the CPC Plus model, reaching consensus to provide immediate feedback addressing a core concern with the model. **The Task Force expressed unanimous support for a recommendation that the CPC Plus model be modified to allow ACO-affiliated primary care physicians (“PCPs”) to be eligible to participate in the CPC Plus model.** We are not recommending changes to the practice selection criteria, merely the removal of the exclusion of ACO-affiliated PCPs.

Additionally, one Task Force member representing federally qualified health centers (“FQHC”) which are part of a Medicare ACO was particularly concerned that the proposed approach would be another limitation on their ability to participate in CMS APM models (a concern similar to the regrettable FQHC exclusion from the Comprehensive Primary Care Initiative).

We anticipate that our recommendation may cause CMS concerns regarding evaluation issues and the potential for double payment through the incentive mechanisms of both programs. An effective way to conduct a CPC Plus evaluation may be to use multiple analytical

¹ The Task Force is a group of private sector stakeholders that wish to accelerate the pace of delivery system transformation. Representing a diverse set of organizations from various segments of the industry – currently including providers, health plans, employers, and consumers – we share a common commitment to transform our respective businesses and clinical models to deliver the triple aim of better health, better care, and reduced costs. Our member organizations aspire to put 75 percent of their business into value-based arrangements which focus on the triple aim by 2020. We strive to provide a critical mass of policy, operational, and technical support from the private sector that, when combined with the work being done by CMS and other public and private stakeholders, can increase the momentum of delivery system transformation.

arms, with the ACO physicians placed in one arm. Further, our members believe that any “double-dipping” concern can be addressed by modifying the CPC Plus incentive system for ACO-affiliated PCPs in a way that best determines success. The Task Force stands ready to work with CMS to find an appropriate solution to allay potential double-dipping concerns.

We appreciate your consideration of our recommendation. We welcome the chance to discuss this issue further with you. Please do not hesitate contacting Task Force Executive Director Jeff Micklos at (202) 774-1415 or jeff.micklos@leavittpartners.com for follow up.

Sincerely,

Lee Sacks

EVP Chief Medical Officer
Advocate Health Care

Francis Soistman

Executive Vice President and President of
Government Services
Aetna

Farzad Mostashari

Founder & CEO
Aledade, Inc.

Shawn Martin

Senior Vice President, Advocacy, Practice
Advancement and Policy
American Academy of Family Physicians

Peter Leibold

Chief Advocacy Officer
Ascension

Emily Brower

Vice President, Population Health
Atrius Health

Jeffrey Hulburt

President and Chief Executive Officer
Beth Israel Deaconess Care Organization

Dana Gelb Safran, Sc.D.

Chief Performance Measurement &
Improvement Officer and
Senior Vice President, Enterprise Analytics
Performance Measurement & Improvement
Blue Cross Blue Shield of Massachusetts

Joseph Hohner

Executive Vice President, Health Care Value
Blue Cross Blue Shield of Michigan

Kristen Miranda

Senior Vice President, Strategic
Partnerships & Innovation
Blue Shield of California

Michael Rowan

President, Health System Delivery and Chief
Operating Officer
Catholic Health Initiatives

Carlton Purvis

Director, Care Transformation
Centra Health

Wesley Curry

Chief Executive Officer
CEP America

Susan Sherry

Deputy Director
Community Catalyst

Robert Greene

Executive Vice President, Chief Population
Health Management Officer
Dartmouth - Hitchcock

Shelly Schlenker

Vice President, Public Policy, Advocacy &
Government Affairs
Dignity Health

Chris Dawe
Managing Director
Evolut Health

Ronald Kuerbitz
Chief Executive Officer
Fresenius Medical Care

Angelo Sinopoli, MD
Vice President, Clinical Integration & Chief
Medical Officer
Greenville Health System

Stephen Ondra
Senior Vice President and Enterprise Chief
Medical Officer
Health Care Service Corporation

Dr. Richard Merkin
President and Chief Executive Officer
Heritage Development Organization

Mark Wilson
Vice President, Health and Employment
Policy, Chief Economist
HR Policy Association

Anne Nolon
President and Chief Executive Officer
HRHealthcare

Lynn Richmond
Executive Vice President
Montefiore

Leonardo Cuello
Director
National Health Law Program

Debra Ness
President
National Partnership for Women & Families

Martin Hickey
Chief Executive Officer
New Mexico Health Connections

Jay Cohen
Senior Vice President
Optum

Kevin Schoeplein
President and Chief Executive Officer
OSF HealthCare System

David Lansky
President and Chief Executive Officer
Pacific Business Group on Health

Timothy Ferris
Senior Vice President, Population Health
Management
Partners HealthCare

Jay Desai
Founder and CEO
PatientPing

Blair Childs
Senior Vice President
Premier

Joel Gilbertson
Senior Vice President
Providence Health & Services

Steve Wiggins
Chairman
Remedy Partners

Michael Slubowski
President and Chief Executive Officer
SCL Health

Bill Thompson
President and Chief Executive Officer
SSM Health Care

Rick Gilfillan
President and Chief Executive Officer
Trinity Health

Judy Rich
President and Chief Executive Officer
Tucson Medical Center Healthcare

Dorothy Teeter Director, Washington State
Health Care Authority

cc. Rahul Rajkumar, M.D.