



July 29, 2020

The Honorable Nancy Pelosi
Speaker of the House
U.S. House of Representatives
Washington, DC 20515

The Honorable Kevin McCarthy
Minority Leader
U.S. House of Representatives
Washington, DC 20510

The Honorable Mitch McConnell
Majority Leader
U.S. Senate
Washington, DC 20510

The Honorable Chuck Schumer
Minority Leader
U.S. Senate
Washington, DC 20515

Re: [HCTTF Recommendations to Support APM Participants](#)

Dear Speaker Pelosi, Minority Leader McCarthy, Majority Leader McConnell, Minority Leader Schumer:

The Health Care Transformation Task Force, a private sector consortium of payers, providers, purchasers and patient organizations, writes to urge Congress to take bold action to advance value-based payment and care delivery during and after the COVID-19 pandemic.

The crisis has laid bare the shortcomings of a fee-for-service system. The disruption of normal care delivery patterns and practices caused by stay-at-home orders and social distancing policies has significantly interrupted cash flow, thereby threatening the viability of many physician practices and institutional providers.

Providers operating under mature value-based payment models have shown the ability to withstand the pressures associated with COVID-19. Providers operating under capitated or global budget models have not experienced the cash flow disruption that have besieged fee-for-service providers. Advanced population health infrastructure has been leveraged to continue to manage care for patients, particularly those vulnerable or seriously ill patients. It is these positive experiences that should be championed and duplicated to ensure that this system as a whole is on the path to a modern delivery model that provides high quality care at lower cost which results in healthier individuals and communities.

The health care community and public health infrastructure depend on the federal government's leadership in responding to this emergency. Health care organizations are looking for clear and actionable guidance from federal health care programs to allay any uncertainty about what is expected of them, including support for continued advancement to a value-based care delivery system.

The Health Care Transformation Task Force requests that Congress take three actions to bolster the payment incentives that drive providers to engage in Medicare value-based payment models:

- **First, Congress should extend the five percent bonus payment for Advanced APMs for five more years.** MACRA has not yet driven the desired uptake of alternate payment models, so the availability of financial incentives designed to drive provider uptake of value-based payment models should be extended.
- **Second, Congress should give CMS the authority to set the thresholds for providers to qualify for bonus payments under the Advanced APM payment policy as defined by MACRA.** The current statutory thresholds have already proven to be too high and difficult to meet and will increase from 50 percent to 75 percent in the 2021 performance year. Providing CMS the authority to set these thresholds will allow for more realistic thresholds that can be differentiated depending on the characteristics of particular value-based payment models.
- **Finally, Congress should direct CMS to waive payment and patient count thresholds and deem all entities participating in eligible Advanced APMs to have satisfied Qualifying APM Provider (QP) thresholds for 2020 performance.** The Task Force appreciates that CMS has taken steps to extend leniency for clinicians eligible for the Merit-based Incentive Payment System (MIPS) in response to COVID-19. Similar leniency should also be applied to Advanced APM participants.

HCTTF appreciates and acknowledges the important steps that Congress, HHS and CMS have already taken to provide payment relief and regulatory flexibility during the pandemic and stands ready to work with policymakers to help make this vision a reality across the United States. If you have question or follow up, please contact HCTTF Executive Director Jeff Micklos at jeff.micklos@hcttf.org or 202.774.1415.

Sincerely,

The Health Care Transformation Task Force