

May 14, 2021

Elizabeth Fowler, JD, PhD
Director, Center for Medicare & Medicaid Innovation
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Baltimore, MD 21244

Re: Sunset of Comprehensive Primary Care Plus

Dear Dr. Fowler:

On behalf of the 167 undersigned health care practices, we thank you for your continued commitment to establishing high-quality primary care as the foundation of our health care system. All of our practices are successful participants in the Comprehensive Primary Care Plus (CPC+) model. As you know, the CPC+ model is intended to strengthen primary care by providing alternative payments that facilitate care delivery reform. Many of our practices have been transforming for years before CPC+, including through participation in the original CPC model. We have deployed vital care coordination and management services that enhance patient care and advance health equity while reducing health care costs. Year over year, our practices have improved quality, reduced emergency department utilization, and as 2019 data has shown, we reduced acute hospitalizations. Our ability to remain nimble in the ever-evolving health care landscape has benefitted our patients and communities, ensuring we deliver the right care, to the right patient, at the right time, in the right location. Unfortunately, when the CPC+ model sunsets, there is no clear mechanism for our practices to sustain our current practice model. We are calling on the Center for Medicare and Medicaid Innovation (CMMI) to develop solutions to help CPC+ practices successfully transition into other alternative payment models.

The COVID-19 pandemic has underscored the importance of a strong, stable primary care system for patients and the health system in general. In a year where primary care practices have faced endless challenges, our practices have maintained a high level of resiliency due to the alternative payment mechanisms provided by participating in CPC+. Due to the prospective care management fees from CPC+, we were able to more rapidly deploy innovative actions to provide continuous, high quality primary care to our patients and advance public health in our communities amid the pandemic, such as scheduling telehealth visits for patients with chronic conditions; setting up drive-through COVID-19 testing centers; and helping patients safely access the appropriate level of care based on their symptoms.

Despite these successes, we are facing dire circumstances as the sunset of the CPC+ model looms closer with a stark financial cliff that –without intervention– will result in the loss of staff and jeopardize our ability to provide ongoing care coordination and care management services for our patients and communities. The other alternative payment model opportunities currently available to us are limited, will not provide the same level of support for our practices as CPC+, and frankly are not financially viable for us in the short-term. We have invested significant time and resources transforming our practice to be successful in CPC+ and we do not wish to revert to traditional fee-for-service payment.

We ask that you recognize our commitment to advancing Medicare's transition to value-based care by creating a bridge for practices transitioning from CPC+ to their next model of choice, whether that be participating in another CMMI model such as Primary Care First or

Direct Contracting or joining an ACO, which is not an easy transition. A bridge will provide us the flexibility and financial security we need to ensure the gains made over the last five to 10 years are not lost by backsliding into fee-for-service and will allow us to continue to provide enhanced primary care services to our patients and communities without disruption. We share your goals of improving quality, reducing spending, and ultimately improving the health of communities through care delivery and payment reform. We strongly believe that a short-term investment in helping CPC+ practices successfully transition into new APMs will help advance the triple aim at the heart of CMMI's mission.

We appreciate your consideration of this matter. Should you have any questions or wish to speak directly with any practice regarding our experience or unique financial situation, please contact Kate Freeman at katef@aafp.org.

Sincerely,

Abington Adult Medicine
Abington Bucks Internal Medicine
Abington Family Medicine
Abington Plaza Medical Associates
Abington Primary Care Medicine
Albany Family Medicine
Ambler Medical Associates
Associates in Jefferson Primary Care
Associates of Family Medicine
Berkley Primary Care, PLC
BiCounty Medical Associates
Blue Bell Family Practice
Brown Medicine
Burnt Hills Pediatrics and Internal Medicine
Bustleton and Verree Medical Practice
Buxmont Primary Care
Byers Peak Family Medicine
Capital Healthcare Associates
CapitalCare Family Medicine Charlton
CapitalCare Family Practice Averill Park
CapitalCare Family Practice Clifton Park
CapitalCare Family Practice Great Oaks
CapitalCare Family Practice Guilderland
CapitalCare Family Practice Ravena
CapitalCare Family Practice River Road
CapitalCare Family Practice Rotterdam
CapitalCare Family Practice Slingerlands
CapitalCare Internal Medicine Balltown Road
CapitalCare Internal Medicine Nott Street
CapitalCare Internal Medicine River Road
Central Square Medical Center - Grant Avenue
Centura Health Physician Group
Cheltenham Internal Medicine
CHI St. Vincent Medical Group
Clifton Park Family Medicine
Coldwater Medical, Inc.

Community Care Family Medicine
Community Care Family Practice Colonie
Community Care Internal Medicine Clifton Park
Dayton Family Practice Associates, Inc.
Delmar Internal Medicine
Elkins Park Medical Associates
Family Care Medical Center
Family Physicians, Inc.
Family Practice at Makefield Executive Quarters
Family Practice of Willow Grove
Feasterville Family Health Care Center
Foresight Family Physicians
Gwynedd Family Medicine
Hartsville Medical Practice
Honolulu Primary Care Associates, LLC
Horsham Family Practice
Internal Medicine Associates of Abington
Internal Medicine Associates of Abington - Huntingdon Valley
Internal Medicine Associates of Abington Horsham
Internal Medicine of West Michigan
Jefferson Family Medicine Associates
Jefferson Health Art Museum Area
Jefferson Health Voorhees Primary Care
Jefferson Internal Medicine Associates
Jefferson Internal Medicine Associates at Bala
Jefferson Internal Medicine Chinatown
Jefferson Primary Care - Navy Yard
Jefferson Women's Primary and Specialty Care
Juniata Family Practice
Kettering Physician Network Primary Care Beaver View
Kettering Physician Network Primary Care CenterMed
Kettering Physician Network Primary Care Centerville
Kettering Physician Network Primary Care Congress Park
Kettering Physician Network Primary Care Englewood
Kettering Physician Network Primary Care Fairborn
Kettering Physician Network Primary Care Far Hills
Kettering Physician Network Primary Care Franklin
Kettering Physician Network Primary Care Greene 200
Kettering Physician Network Primary Care Greene 220
Kettering Physician Network Primary Care Indian Creek Oxford
Kettering Physician Network Primary Care Indian Creek Ross
Kettering Physician Network Primary Care Integrated Medical Group
Kettering Physician Network Primary Care Lincoln Park
Kettering Physician Network Primary Care Lincoln Park #200
Kettering Physician Network Primary Care Miamisburg North
Kettering Physician Network Primary Care Miamisburg South
Kettering Physician Network Primary Care Middletown
Kettering Physician Network Primary Care Middletown Summit
Kettering Physician Network Primary Care N Detroit Family Medicine
Kettering Physician Network Primary Care N Detroit Internal Medicine
Kettering Physician Network Primary Care Ollie Davis

Kettering Physician Network Primary Care Piqua Kienle
Kettering Physician Network Primary Care Ross
Kettering Physician Network Primary Care Southmoor
Kettering Physician Network Primary Care Springboro
Kettering Physician Network Primary Care Springfield Center
Kettering Physician Network Primary Care Sugarcreek
Kettering Physician Network Primary Care Sycamore Family
Kettering Physician Network Primary Care Tipp City
Kettering Physician Network Primary Care Troy Stanfield
Kettering Physician Network Primary Care Walden Ponds
Kettering Physician Network Primary Care Xenia
Latham Internal Medicine
Latham Medical Group
Lawndale Internal Medicine
Levittown Family Medical Associates
Little Rock Family Practice Central
Little Rock Family Practice West
Maria Stein Family Practice Inc.
Matthews-Vu Medical Group
Mayfair Internal Medicine
MidValley Family Practice
Morrell Park Family Practice
Neshaminy Medical
Neshaminy Medical
New Falls Medical Center
Niskayuna Internal Medicine
Oberlin Geriatrics/Internal Medicine - NOMS Healthcare
Oregon Health and Science University Family Medicine at Gabriel Park
Oregon Health and Science University Family Medicine at South Waterfront
Oregon Health and Science University Internal Medicine at Marquam Hill
Oregon Health and Science University Primary Care at Orenco Station
Partners in Family Medicine - Cropseyville
Partners in Family Medicine- North Greenbush
Partners In Internal Medicine
Primary Care Associates of Lansdale
Queen Anne Medical Center
Rardin Family Practice; The Ohio State University Department of Family and Community
Medicine
Richboro Medical
Roaring Fork Family Practice
SAMA Healthcare Services
Saratoga Medical Associates
Schodack Internal Medicine and Pediatrics
South Olds Medical Center
Springhouse Internal Medicine
Surface Creek Family Practice
Sweetbriar Family Medicine
The Office of Dr. Lev Barats
Tillman Family Practice
UC Health Primary Care Burnet
UC Health Primary Care Clifton

UC Health Primary Care Family Medicine at West Chester South
UC Health Primary Care Internal Medicine and Pediatrics Hoxworth
UC Health Primary Care Internal Medicine and Pediatrics West Chester North
UC Health Primary Care Internal Medicine Hoxworth
UC Health Primary Care Midtown
UC Health Primary Care Milford
UC Health Primary Care Montgomery
UC Health Primary Care Tri-County
UC Health Primary Care Wyoming
UCHealth Family Medicine - Firestone
UCHealth Family Medicine - Greeley
UCHealth Family Medicine - Longmont
UCHealth Family Medicine - North Loveland
UCHealth Family Medicine - Windsor
UCHealth Internal Medicine - East Loveland
UCHealth Internal Medicine - Greeley
UCHealth Internal Medicine - Longmont
UCHealth Internal Medicine - Prospect
UCHealth Internal Medicine - Snow Mesa
UCHealth Internal Medicine and Pediatric Care - Snow Mesa
UCHealth Primary Care - Briargate
UCHealth Primary Care - Estes Park
UCHealth Primary Care - Fontanero
UCHealth Primary Care - Rockrimmon
UCHealth Primary Care - Sterling
University Physicians, Incorporated - Aurora, CO
Western Valley Family Practice
Willow Grove Internal Medicine
Woodbridge Medical Associates, P.A.
Wyncote Family Medicine