

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](mailto: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