

March 29, 2020

The Honorable Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
US Department of Health & Human Services  
Hubert H. Humphrey Building  
200 Independence Avenue, SW  
Washington, DC 20201

The Honorable Brad Smith  
Deputy Administrator and Director  
Center for Medicare and Medicaid Innovation  
US Department of Health & Human Services  
Hubert H. Humphrey Building  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Administrator Verma and Director Smith:

The undersigned organizations write to urge the Center of Medicare and Medicaid Innovation to accelerate CPC+ payments forward to participating health care providers. Primary care physicians and providers on the frontlines of the COVID-19 pandemic are providing care to the growing population of individuals infected, while also maintaining access to care for those patients who are not infected but require ongoing care for their health conditions in the community. Today, these providers are facing severe and growing financial difficulties.

Physicians and other clinicians are facing similar financial stresses as cancellation rates have more than doubled. Many physicians and other clinicians have moved a large portion of their practice to virtual platforms. The increased flexibility in telehealth provided by CMS and commercial payers has been foundational in providing the means to extend care to vulnerable populations in a manner that protects them from unwarranted exposure; however there is an implementation lag. As physicians and other clinicians face growing financial difficulties, they will be forced to make operational decisions in the next two to six weeks that could jeopardize access to care for their patients and the communities they serve, and the future of CPC+ as a whole.

CPC+ was an important step to move physicians and practices away from the limitations of fee for service. However, our experience to date with CPC+ practices navigating the COVID-19 pandemic is that they are still experiencing financial difficulties that endanger not only their ability to provide the enhanced services of CPC+, but even the basic services of the practice. As this is largely a crisis-related cash flow issue, we believe CMS can strengthen the CPC+ program and its participating practices by advancing next quarter's care management fees (CMF) now.

Waiving notice and comment rulemaking when doing so will provide immediate relief to hospitals and physicians.

- Advance three months (at least May - July 2020) of CPC+ CMF payments as soon as possible.
- Continue making CPC+ CMF payments on schedule for the duration of the national emergency.
- Advance next quarter's primary care prospective payment for Track 2 practices.
- Following the end of the national emergency, CPC+ CMF payments would be reduced in order for CMMI to recoup the advancement.
- Following the end of the national emergency, CPC+ Track 2 practices would have the primary care prospective payment reduced 50% for the next two quarters to repay the advancement.

We would appreciate discussing with you how to implement this recommendation across provider types. Thank you for your consideration and support of primary care during this national crisis.

Sincerely,

Aledade  
American Academy of Family Physicians  
American College of Physicians  
Elation Health  
Partnership to Empower Physician-Led Care