



June 14, 2018

Mr. Adam Boehler
Deputy Administrator and Director of the Center for Medicare and Medicaid Innovation
Centers for Medicare & Medicaid Services (CMS)
7500 Security Blvd
Baltimore, MD 21244

Dear Deputy Administrator Boehler:

The undersigned organizations share CMS’s commitment to promoting alternative payment models that allow health care organizations to move from a payment system that rewards volume of services to one that rewards value of care, such as the Bundled Payments for Care Improvement Advanced (“BPCI Advanced”) model. Clinical episode-related payments can promote high-quality, high-value care for Medicare beneficiaries and we are pleased to see CMS introduce this new opportunity for providers to participate in an Advanced Alternative Payment Model under the Quality Payment Program.

However, BPCI Advanced applicants only received key model information (including episode target prices, and summary and raw claims data) from CMS in the beginning of June; with signed Participant Agreements due August 1st, this timeline hinders applicants’ ability to make optimal participation decisions by the current deadline. As you are aware, organizations utilize the summary and raw claims data files along with the target price information to complete complex analyses and negotiations before making a decision to participate in the model and what episodes to pursue. For health systems and physician groups operating in multiple markets with various configurations and contracts, this can be a particularly challenging exercise. This truncated timeline may lead providers to pass on participating in the BPCI Advanced model altogether or being more conservative in their episode selection.

We urge CMS to mitigate the potential attrition of applicants and episode participation by **offering an optional delayed Performance Year 1 start date of January 1, 2019**, with a Participation Agreement submission deadline of November 1, 2018. This will allow for all willing providers to have a chance to participate in the first BPCI Advanced cohort, while allowing applicants that are ready to start by the original program start date of October 1, 2018 to do so. We believe this proposal reasonably balances a provider’s need for adequate time to evaluate the BPCI Advanced opportunity with CMS’s desire to sufficiently populate the model’s first cohort to produce meaningful data for evaluation.

We encourage CMS to take these steps to provide reasonable flexibility for applicants and realize the full potential of the BPCI Advanced program to test and inform improvements to the Medicare program. Thank you for your consideration.

Sincerely,

Health Care Transformation Task Force

American Medical Association

American College of Cardiology

American Medical Group Association

American College of Physicians

Pacific Business Group on Health

American College of Surgeons