Note: The application period for this model **closed** on November 30, 2023.

What is Making Care Primary?

Making Care Primary (MCP) is an alternative payment model (APM) created by CMS to offer primary care clinicians another way to receive payment for their services.

Who's eligible to join this model?

MCP was initially offered in **8 states** (CO, NC, NJ, NM, NY, MA, MN, and WA), and the application portal closed in November 2023. Updated information will be provided should the program open to new participants.

Eligible participants include solo primary care practices, Indian Health Programs, Federally Qualified Health Clinics (FQHCs), group practices, health systems, and certain Critical Access Hospitals (CAHs). Ineligible participants include rural Health Clinics (RHCs), concierge practices, Grandfathered Tribal FQHCs and PCF/ACO REACH Participant Providers active as of 5/31/23.

What are the key elements that make up this model?

MCP is set to last for **10.5 years**. The unprecedented length of MCP was selected to allow program participants extended time to adapt to and familiarize themselves with the program's requirements. This **progressive** model consists of **three tracks**-

Track 1 "Building Infrastructure"	Track 2 "Implementing Advanced Primary Care"	Track 3 "Optimizing Care & Partnerships"
Onboarding for clinicians with no experience in value-based care	For clinicians with some experience in value-based care	For clinicians with robust experience in value-based care
Uses conventional fee-for- service (FFS) to pay for services	Uses a 50/50 mix of FFS and prospective , population-based payments	Uses only prospective, population-based payments
Eligible for three forms of supplemental payments*	Eligible for some forms of supplemental payments*	Eligible for some forms of supplemental payments*
Participants can remain on this track for up to 2.5 years	Participants can remain on this track for up to 2.5 years	Participants can remain on this track for the full duration of the model, i.e., 10.5 years

^{*}see Supplemental Payments

Participants can select which track they feel most comfortable starting in and can progress to the next track as they build readiness for the care delivery and payment mechanisms specific to the subsequent track.

Supplemental Payments

Upfront Infrastructure	Enhanced Services Payment	Performance Incentive Payment	Prospective Primary Care
Payment (UIP)	(ESP)	(PIP)	Payment (PPCP)
Track 1 only	Track 1, 2, 3	Track 1, 2, 3	Track 2, 3 only
Available to participants who are new to value-based arrangements and meet a low-revenue threshold or do not	Risk-adjusted per beneficiary per month (PBPM) payment, in addition to typical payment for primary care services.	Upside risk only bonus payment (assessed yearly) based on quality, utilization, and cost. Bonus potential increases progressively	Replaces FFS revenue for patients attributed to Making Care Primary. Payments will reflect a participant's historical
have an e-consult platform.	Note: this payment decreases by track as participants build	by track. Note: upside risk means a potential for	billing record for the first 3 years of the model.
Eligible participants may receive \$72,500 in a lump sum payment at the start of Year 1 and an additional \$72,500 at the start of Year 2.	capacity	gain	Additionally, for participants in Track 3 , CMS will base a portion of the PPCP supplemental payment on regional spending trends.
Participants must use these funds for increased staffing, social determinants of health (SDOH) strategies, and/or healthcare clinician infrastructure.			tienas.

What are other elements that participants should know about on MCP?

Participants will need to strengthen relationships with **specialty care clinicians** and incorporate evidence-based **behavioral health** screenings and evaluation to improve coordination of services and patient care. Here's what that looks like:

Specialty Care



Track 1 participants will use **data tools** to **identify high-quality specialists**.



Track 2 participants will identify high-quality Specialty Care Partners through collaborative care arrangements (CCAs) and implement enhanced e-consults with at least 1 specialist.



Track 3 participants will establish enhanced relationships with Specialty Care Partners through timelimited co-management relationships.



Participants in **Track 2 and 3** can earn **\$40 per service** when they send an eligible e-consult to any specialist (subject to geographic adjustment).



Track 3 Specialty Care
Partners in a
collaborative care
arrangement (CCA) can
bill CMS an additional
\$50 per beneficiary per
month (PBPM).

Behavioral health



Track 1 participants will identify staff & develop workflows to implement a behavioral health approach grounded in measurement-based care (MBC).



Track 2 participants will implement a behavioral health approach using MBC such as leveraging tools & data to inform treatment decisions.

Additionally, participants will screen for key behavioral health conditions such as depression & substance use disorder.



Track 3 participants will **optimize behavioral health workflows** using a quality improvement framework.

How does MCP compare to other APMs in primary care?

Making Care Primary (MCP)	Primary Care First (PCF)	Comprehensive Primary Care Plus (CPC+)	Comprehensive Primary Care (CPC)
Announced June 2023	Announced April 2019	Announced April 2016	Announced Fall 2011
Will become active in July 2024 (application period is closed)	Active (application period is closed)	Inactive	Inactive
Offered in 8 states	Offered in 26 states & regions	Offered in 18 states & regions	Offered in 7 states & regions
Offers three participation tracks	Offers two participation tracks	Offers two participation tracks	Offers a single participation track
Payments consist of FFS (Track 1, 2), prospective, population-based payments (Track 2, 3), and supplemental payments (varies by Track)	Payments consist of a flat payment for primary care visits, a population-based payment, and a performance-based adjustment with both an upside & downside risk	Payments consist of capitation payment (PBPM), performance-based incentive payment, conventional FFS (Track 1), and FFS adjusted by Comprehensive Primary Care Payments (CPCP) (Track 2)	Payments consist of FFS, capitation payment (PBPM), and shared savings from the Medicare program
10.5-year payment model	5-year payment model	5-year payment model	4-year payment model

How has the American College of Physicians (ACP) responded to the introduction of MCP?

ACP has commended CMS for introducing MCP as a new payment model in primary care and for incorporating several recommendations made by ACP to facilitate improved coordination between primary care and other specialties. CMS incorporated several recommendations outlined in ACP's proposal titled, "The 'Medical Neighborhood' Advanced Alternative Payment Model (AAPM) Proposal" which was submitted to CMS's Physician-Focused Payment Model Technical Advisory Committee. Additionally, MCP aligns with the principles outlined in a position paper by ACP titled, "Beyond the Referral: Principles of Effective, Ongoing Primary and Specialty Care Collaboration" which seeks to promote stronger care coordination between primary care physicians and other specialists.

Where can I find more information?

- CMS Overview of Making Care Primary
- Other APMs in Primary Care
- CMS Participation Status Lookup Tool