



April 27, 2020

Mrs. Seema Verma  
Administrator  
Centers for Medicare and Medicaid Services  
U.S. Department of Health and Human Services  
7500 Security Boulevard  
Baltimore, MD, 21224

Dear Administrator Verma,

Thank you for your leadership during the COVID-19 pandemic. We appreciate the action that you have taken to provide flexibilities that reduce burden on physician practices so that they can focus their attention on caring for their patients and ensuring the sustainability of their businesses.

The Medicare Shared Savings Program (MSSP), Medicare's flagship value-based care model is as important now as ever. As you know, physician-led models have achieved significant results through the program, saving Medicare money while improving health outcomes for patients.

Many accountable care organizations (ACOs), including independent physician practices, continue to work hard to achieve positive results in 2020 despite the challenges associated with the COVID-19 pandemic. For example, many model participants have transitioned care to virtual platforms and/or provided care on porches or in parking lots or other outdoor settings as appropriate. Model participants are also working to establish long-term plans for triaging and treatment patients with chronic conditions who are currently not seeking care because of the COVID-19 pandemic. They are doing all of this while also trying to procure the personal protective equipment (PPE) needed to treat patients in person, apply for loans, keep track of new guidance and policy changes, and make tough financial decisions related to their business.

As you consider what changes may be necessary for the Medicare Shared Savings Program (MSSP), **we strongly urge you to not eliminate the possibility of achieving shared savings in 2020.** While some ACOs have been diverting resources to fight the pandemic and have not engaged in population health activities this year, many ACOs have and continue to work hard to improve care and reduce costs.

Instead, **we urge you to allow for an adjustment for ACOs that feel they cannot be fairly measured on population health performance due to the circumstances of the pandemic.** This could be accomplished by allowing providers to drop down to Basic Level B for 2020, rather than requiring them to decide on May 31 to drop out of the program altogether. Such a policy would maintain momentum away from fee-for-service and toward value-based care.

Finally, we also **ask that you consider delaying the application deadline for ACOs who seek to participate in MSSP in 2021.**

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Please do not hesitate to reach out if you have any questions or if we can be a resource in any way. If you would, we would be happy to convene a roundtable of independent practices and physicians who are currently participating in MSSP so you can hear from them directly about their experience. I can be reached at [kristen@physiciansforvalue.org](mailto:kristen@physiciansforvalue.org) or 417-496-4420.

Sincerely,

Kristen McGovern  
Executive Director

**About the Partnership to Empower Physician-Led Care**

The Partnership to Empower Physician-Led Care (PEPC) is a membership organization dedicated to supporting value-based care to reduce costs, improve quality, empower patients and physicians, and increase access to care for millions of Americans through a competitive health care provider market. We believe that it is impossible to achieve truly value-based care without a robust independent practice community. Our members include Aledade, American Academy of Family Physicians (AAFP), California Medical Association, Florida Medical Association, Medical Group Management Association (MGMA), and Texas Medical Association’s Practice Edge. We also have individual and small medical group supporters across the country, many of whom are independent physicians or practices and wish to remain so.