



PEPC Statement on the CMS Innovation Center Strategy Refresh

The Partnership to Empower Physician-Led Care (PEPC) applauds the Centers for Medicare and Medicaid Services (CMS) on the release of the CMS Innovation Center's strategy refresh, "[Driving Health System Transformation: A Strategy for the CMS Innovation Center's Second Decade.](#)"

We believe that physicians – especially independent physician and practices– are the linchpin of our nation's health care system. Physician-led groups have repeatedly demonstrated their superior ability to generate positive results in advanced primary care and accountable care arrangements, both in improved health outcomes and reduced costs.

We are pleased to see that the CMS Innovation Center is committed to making model design choices that ensure its models are accessible to a range of providers, including small providers, independent practices, and physicians practicing in rural and/or underserved areas. We agree that policies that reflect providers' varying abilities to assume risk, programs that provide upfront funds for investment, and metrics that reflect a wider array of transformational policy goals will encourage smaller, independent practices to consider participating in value-based payment innovations.

In addition to the specific goals and next steps outlined in the refreshed strategy, we encourage the CMS Innovation Center to focus on ensuring that physicians and practices participating in its models clearly understand how to leverage their population health investments into a sustainable, scalable practice change. Practices should understand the options for "leveling up" their participation, for example, by moving from a care management model to a model that requires risk or by deepening the amount of risk taken among other options.

In our vision of the future, independent practices not only survive, but thrive as a result of policies that place physicians in a central role in driving system transformation. We look forward to working with the CMS Innovation Center to implement its strategy.