

April 13, 2021

Elizabeth Fowler  
Deputy Administrator and Director  
Center for Medicare & Medicaid Innovation  
U.S. Department of Health & Human Services  
Hubert H. Humphrey Building  
200 Independence Avenue, SW  
Washington, DC 20201

Dear Deputy Administrator Fowler:

The undersigned organizations, through the advocacy of the America's Physician Groups Direct Contracting Coalition, submit this letter **strongly urging you to provide an opportunity for prospective applicants to apply for the Global and Professional Direct Contracting Model (GPDC or the Model) by reopening the portal for applications and accepting new applicants for a January 1, 2022, start date.**

The April 8 announcement from the agency indicated that it would not solicit any further applications beyond the initial April 1, 2021, cohort. This means that the second cohort, beyond those that deferred from an Implementation Period or first performance year applicants, will now be halted, thus depriving many of the undersigned organizations from participating in the program as planned for January 1, 2022.

We regard this unfortunate decision as a serious blow to the progress of the movement toward value-based care, perhaps the best hope for bringing higher quality and more affordable healthcare to all Americans. We have worked steadfastly for over ten years since the ACA was enacted to mature the risk model and the goal that was envisioned: a capitated payment model supported by robust quality improvement measurement incentives. Direct Contracting represents that goal, and having it curtailed now will do a major disservice to the country, the providers that have worked hard to make it succeed, and to the Medicare beneficiaries that depend upon it.

As you are well aware, the United States pays approximately twice as much per capita for healthcare as all other countries who are members of the international governmental Organization for Economic Co-operation and Development (OECD), and yet receives the lowest quality care in return of all the OECD countries. We are on the cusp of reversing those shameful statistics and the Direct Contracting model is the heart of that effort. To halt our progress, and potentially move us backward, seems almost unthinkable.

Potential participants have made substantial investments and conducted significant preparation in attempting to meet the requirements of participation for a January 2022 start date and to ensure that they are also able to embark upon the Model from the strongest vantage point possible because they regard it as America's best hope in redesigning healthcare. While we fervently support the Administration's efforts to expand coverage underway, the

expansion of coverage does not lower costs or improve quality. The only known and proven way to improve quality and lower costs is bringing value into the delivery system and curtailing this effort is shortsighted.

CMMI has been an invaluable partner in the development of GPDC and we appreciate the investment the agency has made to ensure its success. Ending the application process early represents a great setback in the viability of the model and is a severe blow to beneficiaries who are expecting CMMI and the undersigned to fix and improve the American healthcare system especially during and after a pandemic crisis.

Thank you for your attention to the above comments. If you have any questions, please contact Valinda Rutledge, Executive Vice President of Federal Affairs at America's Physician Groups, at [vrutledge@apg.org](mailto:vrutledge@apg.org).

Sincerely,

America's Physician Groups  
Accountable Care Learning Collaborative  
ACO Management Services  
Agilon Health  
American Academy of Home Care Medicine  
Association Medical Group of Santa Clara County (SCCIPA)  
Austin Regional Clinic  
California Clinical Partners ACO  
CareJourney  
Catholic Health Physician Partners  
Central Ohio Primary Care Physicians  
ChenMed  
Collaborative Health Systems  
Doc ACO  
Elation Health  
Hackensack Meridian Health  
Hawaii IPA  
Health Alliance ACO d/b/a GW Health Network  
Iora Health  
John Muir Health Physician Network  
Lumeris  
MSO of Puerto Rico, LLC  
MultiCare Connected Care  
Northeast Georgia Health System  
NW Momentum Health Partners ACO  
Ochsner Health  
Palo Alto Foundation Medical Group  
Pearl Health  
Physicians of Southwest Washington

PIH Health  
Pioneer Health Associates  
Prisma Health  
Privia Health  
Prominence Health Plan  
Prospect Medical Group/Prospect Medical Systems  
Renaissance Physicians  
Rush University System for Health  
Silver State ACO  
Signify Health  
South Texas ACO Clinical Partners  
Southwestern Health Resources Affordable Care Network  
Tandigm Health  
Texas Panhandle Clinical Partners  
Texoma Clinical Partners  
TriHealth Inc. in Cincinnati, Ohio  
VillageMD  
Wellmed  
Wellvana