



May 26, 2021

Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244-1850

Dear Administrator Brooks-LaSure:

On behalf of America's Physician Groups (APG) and our member organizations, I would like to congratulate you on your new position as Administrator of the Centers for Medicare and Medicaid Services (CMS). Your extensive experience as both a former deputy director for policy at the Center for Consumer Information and Insurance Oversight within the agency and director of coverage policy where you led implementation of the Affordable Care Act offers an extensive knowledge base and expertise that will allow you to step in seamlessly to lead CMS as it works tirelessly to end the COVID-19 pandemic, expand affordable health care, and advance equity within healthcare. CMS has also always been a valuable partner in transforming America's healthcare delivery system into one that is centered on value over volume. APG shares this commitment to protecting and improving access to affordable, high quality health care for all Americans and looks forward to working with you in your new role as Administrator continuing to build on the progress that has been made in expanding value-based healthcare and moving away from fee-for-service.

### **About America's Physician Groups**

APG is a national professional association representing over 300 physician groups that employ or contract with approximately 195,000 physicians that provide care for nearly 45 million patients. APG has always been the leading association representing accountable, coordinated physician groups. Our tagline, "Taking Responsibility for America's Health," represents our members' vision to move away from the antiquated fee-for-service (FFS) reimbursement system where clinicians are paid "per click" for each service rendered rather than on the outcomes of the care provided. Our preferred model of accountable, risk based, and coordinated care avoids incentives for the high utilization associated with FFS reimbursement. APG is also committed to Medicare Advantage and the flexible, affordable, and efficient care it provides for seniors.

As the largest association of physician groups practicing risk-based coordinated care, APG and its members believe strongly in and are committed to reimbursement systems such as capitation and holding physicians accountable for care, coordination, and quality to improve patient health, while also working to make healthcare more affordable for patients. Data has consistently shown that the providers we represent who engage in high-value, risk-based MA

contracts are immensely efficient in the dissemination of care while simultaneously being more accountable for the quality of care being offered because of operating under a contract mandating risk. This willingness to accept risk not only provides an incentive for our members to maintain accountability for the care they provide and for addressing issues without our healthcare system pertaining to health disparities and equitable outcomes, the move from volume to value will result in reduced spending for CMS and within the healthcare system in general.

As the agency strategizes on how best to address the existing challenges to the nation's healthcare system and anticipate new ones on the horizon, we would like to continue to offer our perspective on the best strategies for making improvements that will benefit patients, health plans, and providers in making our healthcare system as strong as possible. We would appreciate the chance to share the perspective of risk-based organizations, work with you and your staff on the priorities listed below to further advance the value movement and, most importantly, improve the quality and access of health care services.

Thank you for your attention to the above comments. We look forward to continuing to work with you during your time at CMS. Please feel free to contact Valinda Rutledge, Executive Vice President, Federal Affairs, ([vrutledge@apg.org](mailto:vrutledge@apg.org)), if you have any questions, or if America's Physician Groups can provide any assistance as you consider these issues.

Sincerely,



Donald H. Crane  
President and CEO  
America's Physician Groups