

December 2, 2020

The Honorable Mitch McConnell
Majority Leader
United States Senate
United States Capitol Building S-230
Washington, DC 20510

The Honorable Nancy Pelosi
Speaker
United States House of Representatives
United States Capitol Building H-232
Washington, DC 20515

The Honorable Charles E. Schumer
Minority Leader
U.S. Senate
United States Capitol Building S-255
Washington, DC 20510

The Honorable Kevin McCarthy
Minority Leader
United States House of Representatives
United States Capitol Building H-204
Washington, DC 20515

Re: Advanced Alternative Payment Model Thresholds

Dear Senate Majority Leader McConnell, Speaker Pelosi, Senate Minority Leader Schumer, and House Minority Leader McCarthy:

On behalf of the 501 undersigned health care practices and accountable care organizations (ACOs), we thank you for your continued leadership during the COVID-19 public health emergency. As you know, practices taking performance-based risk in advanced alternative payment model (APM) arrangements continue to fight on the pandemic's frontlines. We have deployed vital care coordination and management services that enhance patient care while reducing health care costs. We have taken innovative actions to advance public health in our local communities, such as scheduling telehealth visits for patients with chronic conditions; setting up drive-through COVID-19 testing centers; and helping patients access the appropriate level of care based on their symptoms.

As Congress considers future health care legislation that will continue to bolster and advance the care delivery system, we urge you to take action to ensure that value-based care providers can continue to provide these important services by modifying the unrealistic threshold tests included in the bipartisan Medicare Access and CHIP Reauthorization Act (MACRA) of 2015.

To incentivize providers to switch from traditional fee-for-service Medicare to advanced APMs, MACRA provided a 5% bonus payment to qualifying participants in advanced APMs. The bonus was intended to move clinicians and practices into risk-bearing models that control costs and improve quality, and therefore, contribute to a more sustainable future for traditional Medicare. To be eligible for the bonus, an APM entity must satisfy either a revenue or a patient count threshold. The thresholds are intended to measure whether the APM entity is sufficiently increasing its participation, measured by revenue or patients, in the APM over time. In 2020, the revenue threshold is 50% and the patient count threshold is 35%.

In 2021, both threshold tests are scheduled to increase sharply. The revenue threshold will jump to 75% and the patient participation threshold will jump to 50%. As a result, many practices who

have assumed considerable financial risk and who have invested significant resources into advancing the value-based care movement will not receive their incentive payments. If providers cannot count on receiving these bonus payments, due to unrealistic thresholds, fewer providers will be willing to participate in APMs in the future, exactly the opposite of what MACRA's authors intended when they drafted the threshold tests. This would represent an unfortunate setback in the progress we have made in advancing the value movement and would undermine Medicare's long-term transition to greater levels of performance-based risk.

We ask that you recognize our commitment to advancing Medicare's transition to value-based care by freezing the MACRA thresholds at the 2020 levels for the next two performance years (2021 and 2022). This freeze will give us the flexibility and financial security we need to continue to innovate and improve population health for our patients, as well as to continue to drive forward models that create a fiscally healthy future for the Medicare program.

We appreciate your consideration of this matter.

Sincerely,

21st Century Oncology, Farmington Hills, Macomb, Troy, Clarkston, Pontiac, MI

Abimbola M. Banjo MD P.A., Pleasanton, TX

Access Family Medicine of Sacramento, Sacramento, CA

AccoCare, Sioux Falls, SD

Accountable Care Coalition of Georgia, Houston, TX

Accountable Care Coalition of New Jersey, NJ

Accountable Care Coalition of Northeast Georgia, Houston, TX

Accountable Care Coalition of Northeast Partners, Houston, TX

Accountable Care Coalition of Southeast Partners, Houston, TX

Accountable Care Coalition of Southeast Texas, Houston, TX

Accountable Care Coalition of Southeast Wisconsin, Milwaukee, WI

Accountable Care Coalition of Tennessee, Houston, TX

ACO Clinical Partners, LLC, Louisville, KY

ACO HealthPartners, Jacksonville, FL

Adirondacks ACO, Plattsburgh, NY

Advanced Allergy and Asthma, Clarkston, MI

Advanced Doctors ACO, LLC, West Palm Beach, FL

AdvantagePoint Health Alliance – Blue Ridge, Brentwood, TN

AdvantagePoint Health Alliance – Great Lakes, Brentwood, TN

AdvantagePoint Health Alliance – Laurel Highlands, Brentwood, TN

Advent Health, Altamonte Springs, FL

Advocate Aurora Health, Milwaukee, WI

Affinia Health Network, Muskegon, MI

Aledade, Bethesda, MD

Alicia W Grossmann MD Pa, Austin, TX

AllCare Health Alliance, Camden, NJ

Allied Bone and Joint, South Bend, IN

Allied ENT Specialty Center, South Bend, IN

Allied Physical Therapy, South Bend, IN
Alpine Medical Center Pllc, Alpine, TX
Alta View Sports Medicine - Sandy, Sandy, UT
Amarillo Legacy Medical ACO, Amarillo, TX
AMITA Health Accountable Care Organization, LLC, Chicago, IL
Andre K.S. Tse, M.D. PA, Jacksonville, NC
Anna Abalos, M.D., Family Medicine, Roseville, CA
Arbor Medical, Livonia, MI
Ascension Care Management Health Partners Evansville, LLC, Evansville, IN
Ascension Care Management Health Partners Indianapolis, LLC, Indianapolis, IN
Ascension Care Management Health Partners Tennessee, Nashville, TN
Ascension Health System, St. Louis, MO
Ascension Medical Group, St. Louis, MO
Associated Endocrinologists, Farmington Hills, MI
Associated Family Physicians, Inc., Sacramento, CA
Associated Rheumatology Consultants, Farmington Hills, MI
Associates for Women's Medicine, North Syracuse, NY
Asthma and Allergy, Farmington Hills, MI
Atlantic ACO, Morristown, NJ
Auburn Hills Medical Clinic, Auburn Hills, MI
Auburn Medical Group, Inc., Auburn, CA
Austin Adult GeriMed Associates, Austin, TX
Avera Medical Group, Sioux Falls, SD
Banner Health Network, Phoenix, AZ
Banner Network Colorado, Greeley, CO
Baptist Health Care Partners LLC, Louisville, KY
Bastrop County Medical Associates, PA, Bastrop, TX
Baycare Health Partners, Springfield, MA
BayCare Physician Partners ACO, Clearwater, FL
Baylor Scott & White Quality Alliance, Dallas, TX
Bayview Physicians Group, Chesapeake, VA
Be Well Medical Center, Berkley, MI
Berkshire Medical Center, Pittsfield, MA
Best Care Collaborative, Fort Myers, FL
Beth Israel Lahey Health Performance Network, Wakefield, MA
Billings Clinic, Billings, MT
BJC HealthCare Accountable Care Organization, St. Louis, MO
BoiceWillis Clinic, P.A., Rocky Mount, Spring Hope, Nashville, NC
Bon Secours Medical Group, Cincinnati, OH
Botsford Cancer Center, Farmington Hills, MI
Bull City Family Medicine And Pediatrics, Durham, NC
California Clinical Partners (ACO), Palm Springs, FL
Cancer & Hematology Centers of Western Michigan, Grand Rapids, MI
Cancer & Leukemia Center, Sterling Heights, MI
Cancer Care Associates, Royal Oak, MI
Capital Family Medicine, Raleigh, NC

Capital Family Physicians, P.A., Raleigh, NC
Capitol Internal Medicine Associates, Carmichael, CA
Capstone Health Alliance, Fletcher, NC
Caravan Health ACO 31, LLC, Kansas City, MO
Caravan Health ACO 32, LLC, Kansas City, MO
Caravan Health ACO 33, LLC, Kansas City, MO
Caravan Health ACO 34, LLC, Kansas City, MO
Cardiology and Vascular Associates, P.C., Waterford, Bloomfield Hills, Clarkston, Commerce,
MI
Cardiology Consultants of Philadelphia, Philadelphia, PA
Cardiovascular Medicine, P.C., Davenport, IA
CareConnectMD ACO, Inc., Huntington Beach, CA
CareMount, Chappaqua, NY
Carilion Clinic, Roanoke, VA
Cary Healthcare Associates, P.A., Cary, NC
Cary Internal Medicine And The Diabetes Center, Cary, NC
Cary Medical Group, Cary, NC
CentraCare Health, St. Cloud, MN
Central Minnesota ACO, LLC, St. Cloud, MN
Central Oregon IPA, Bend, OR
Central Virginia Coalition of Healthcare Providers, LLC, Hampton, VA
Chesapeake IPA, Baltimore, MD
CHESS Health Solutions, High Point, NC
CHI Saint Joseph Health Partners, Lexington, KY
Chippewa County War Memorial Hospital, Sault Sainte Marie, MI
CHRISTUS Health, Irving, TX
Chrysalis, an Accountable Care Organization, Houston, TX
CHSPSC ACO 1, LLC, Franklin, TN
CHSPSC ACO 2, LLC, Franklin, TN
CHSPSC ACO 6, LLC, Franklin, TN
CHSPSC ACO 7, LLC, Franklin, TN
CHSPSC ACO 8, LLC, Franklin, TN
CHSPSC ACO 9, LLC, Franklin, TN
CHSPSC ACO 10, LLC, Franklin, TN
CHSPSC ACO 12, LLC, Franklin, TN
CHSPSC ACO 13, LLC, Franklin, TN
CHSPSC ACO 14, LLC, Franklin, TN
CHSPSC ACO 15, LLC, Franklin, TN
CHSPSC ACO 16, LLC, Franklin, TN
CHSPSC ACO 17, LLC, Franklin, TN
CHSPSC ACO 19, LLC, Franklin, TN
CHSPSC ACO 21, LLC, Franklin, TN
Circle Health Alliance, LLC, Lowell, MA
Clarkston Internal Medicine, Clarkston, MI
Clarkston Medical Group, Clarkston, MI
Clarkston Medical Group, Oxford, MI

Cleveland Clinic, Cleveland, OH
CNY Accountable Integrated Medicine, Syracuse, NY
Coastal Carolina Health Care, P.A., New Bern, NC
Coastal Carolina Quality Care, Inc., New Bern, NC
Colon Rectal and General Surgery, West Bloomfield, MI
CommonSpirit Health, Chicago, IL
Community Care Collaborative of Pennsylvania and New Jersey, Doylestown, PA
Community Care Partnership of Maine, Bangor, ME
Complete Health, Jacksonville, FL
Comprehensive Breast Care, Troy, MI
Comprehensive Urology - Affiliates in Urology, Westland, MI
Comprehensive Urology - Grosse Pointe Urology, Roseville, MI
Comprehensive Urology - Jeffrey Weingarten MD PC, Rochester Hills, MI
Comprehensive Urology - Michigan Urological Institute, Southfield, MI
Comprehensive Urology - Oakland County Urologists, Waterford, MI
Comprehensive Urology - Sabry Mansour MD, Lapeer, MI
Comprehensive Urology, Royal Oak, Macomb, Farmington Hills, Sterling Heights, Pontiac, Troy, Garden City, Clarkston, MI
Covenant ACO, Lubbock, TX
Cumberland Center for Healthcare Innovation, Cookeville, TN
David Paul Adams, M.D., P.A., Cary, NC
Dawei Zheng, M.D., Sacramento, CA
Deaconess Care Integration, Evansville, IN
Delaware Care Collaboration, Wilmington, DE
Delaware Valley ACO, Radnor, PA
Devamani Gowda, M.D., Roseville, CA
Dignity Health Care Network, San Francisco, CA
DOC ACO, Palm Springs, FL
DocACO, Gulf Coast, LLC
Doctors ACO, LLC, Athens, GA
Dominion Medical Associates, P.A., Austin, TX
Douglas Young, MD Inc., Sacramento, CA
Downriver Oncology Center, Brownstown, MI
Draper Clinic - Draper, Draper, UT
Duke Connected Care, Durham, NC
Durham Family Medicine, Durham, NC
E.N.T. Surgical Associates, Farmington Hills, Madison Heights, MI
Eastpointe Family Physicians, Eastpoint, MI
Essentia Health, Duluth, MN
Every Woman OB/GYN, Rochester Hills, MI
Fairbourne Station - West Valley, West Valley City, UT
Family Dermatology, Raleigh, Apex, NC
Family First Primary Care, PLLC, Wake Forest, NC
Family Health Care Center, Royal Oak, MI
Family Medical Center of Georgetown, P.A., Georgetown, TX
Family Medicine & Ambulatory Care Center, Fair Oaks, CA

Family Medicine Clinic, Pearsall, TX
Family Practice, Warren, MI
Federation ACO, Portage, MI
Five Star ACO, Tampa, FL
Flora Medical Clinic, PLLC, Austin, TX
Folsom Lake Primary Care, Folsom, CA
Franciscan Northwest Physicians Health Network (d.b.a. Rainier Health Network), Tacoma, WA
Franklin Neurology, Farmington Hills, MI
Gammons Medical, Royal Oak, MI
Gammons Medical, Warren, MI
Gammons Wellness and Dermatology, Royal Oak, MI
General and Vascular Surgery, Elkhart, Mishawaka, South Bend, IN
Generations Family Practice, P.A., Cary, NC
Genesis Physician Services, Kennett Square, PA
Genesys PHO LLC, Burton, MI
Golden Triangle Physician Association, Nederland, TX
Grants Pass Clinic, Grants Pass, OR
Greater Regional Medical Center, Creston, IA
Greenhaven Family Practice, Sacramento, CA
GW Health Network (ACO), King of Prussia, PA
Hamtramck Medical Urgent Care, Hamtramck, MI
Hattiesburg Clinic ACO, Hattiesburg, MS
Hazel Park Medical Center, Hazel Park, MI
Health Leaders Network, Baton Rouge, LA
Healthcare Quality Partners, Morristown, NJ
Helen Newberry Joy Hospital & Healthcare Center, Newberry, MI
Hematology Oncology Consultants, Royal Oak, MI
Heritage Physician Network, Northridge, CA
Hillsdale Hospital, Hillsdale, MI
Holladay Clinic - Holladay, Holladay, UT
Holy Cross Physician Partners, Fort Lauderdale, FL
Horizon Family Medicine, Clayton, Smithfield, Four Oaks, NC
Hospital Physicians Network, Farmington Hills, MI
Houston Methodist Coordinated Care, Houston, TX
Hudson Accountable Care, Houston, TX
Imperial Center Family Medicine and Immediate Care, Durham, NC
Imperium Health, Louisville, KY
Innovation Care Partners, Scottsdale, AZ
Innovative Health Alliance of NY (IHANY), Albany, NY
Inspira Health Center, Woodbury, NJ
Institute of Neuromuscular Medicine, Detroit, MI
Integra Community Care Network, Providence, RI
Intermountain Healthcare, Salt Lake City, UT
Internal Medicine Pediatrics Associates, P.A., Cary, NC
Internal Medicine Physicians, Farmington Hills, MI
Internal Medicine Primary Care Physicians, Bloomfield Hills, MI

Internal Medicine Specialists, West Bloomfield, MI
IU Health ACO, Indianapolis, IN
Jacobs and Van Cleeff Internal Medicine, PC, Cary, NC
JCMC Allergy and Asthma, Jacksonville, NC
JCMC Behavioral and Mental Health, Jacksonville, NC
JCMC Cape Carteret, Cape Carteret, NC
JCMC Family Care Clinic, Jacksonville, NC
JCMC Gastroenterology, Jacksonville, NC
JCMC Richlands, Richlands, NC
JCMC Sick Clinic, Jacksonville, NC
JCMC Sneads Ferry, Sneads Ferry, NC
JCMC Swansboro, Swansboro, NC
JCMC Urgent Care, Jacksonville, NC
JCMC Well Clinic, Jacksonville, NC
JCMC Wilmington, Wilmington, NC
John R Medical Center, Madison Heights, MI
Jose I Sosa MD, Pearsall, TX
Joseph A Marotta MD PA, San Antonio, TX
Kenan & Wang, LLC, Sacramento, CA
Kendall Wong M.D., Odessa, TX
Kestenberg Breast Care Center, Farmington Hills, MI
Kevin Stephens MD PA, Austin, TX
Kingswood Internal Medicine, Bloomfield Hills, MI
Kingswood OB/GYN, Bloomfield Hills, MI
Kolender Medical, Bingham Farms, MI
Kootenai Accountable Care, Coeur d Alene, ID
Kurtis Fox, M.D., Colfax, CA
Lakes Internal Medicine, West Bloomfield, MI
Lee Ann Roberts, Md, PA, Raleigh, NC
Legends Medical Clinic PLLC, Round Rock, TX
Leo Toupin MD PA, Austin, TX
Level One Surgical Specialists, Royal Oak, MI
Lewerenz Medical Center & Longevity Health Institute, Madison Heights, MI
LHS Health Network, Camden, NJ
Life Health Services ACO, Middletown, CT
Lifetime Family Care, Madison Heights, MI
Lincoln Medical Associates, Lincoln, CA
Live Well Neurology and Sleep, Rochester Hills, MI
Loomis Medical Clinic, Loomis, CA
Loyola Physician Partners, Maywood, IL
LTC ACO, Kennett Square, PA
Luminis Health Collaborative Care Network, Annapolis, MD
Main Line Health Physician Partners, Bryn Mawr, PA
Maine Medical Partners, Portland, ME
Mary Washington Health Alliance LLC, Fredericksburg, VA
Maryland Collaborative Care Transformation Organization, Houston, TX

Maryland Primary Care Program, Baltimore, MD
Mass General Brigham, Boston, MA
Mayo Clinic, Rochester, MN
McAuley Health Partners ACO, LLC, Ann Arbor, MI
McAuley Health Partners, Ann Arbor, MI
MD Valuecare, Richmond, VA
Meadville Medical Center, Meadville, PA
Mercy Accountable Care, Conshohocken, PA
MercyOne ACO I LLC, Clive, IA
MercyOne ACO II LLC, Clive, IA
MercyOne ACO III LLC, Clive, IA
MercyOne ACO IV LLC, Clive, IA
MercyOne ACO V LLC, Clive, IA
MercyOne PHSO, Clive, IA
Michael Laffer, D.O. & Gary Berg, D.O., Madison Heights, MI
Michiana Ob/GYN, South Bend, IN
Michigan Center for Rural Health, East Lansing, MI
Michigan Healthcare Professionals Dermatology, Rochester Hills, MI
Michigan Hernia Surgery, Royal Oak, MI
Michigan Premier Internists, Southfield, MI
Michigan Women's Health, Farmington Hills, Clawson, MI
Mid-Atlantic Accountable Care, Morristown, NJ
Millennium Affiliated Physicians, Farmington Hills, MI
Millennium Cardiology, Farmington Hills, MI
Millennium Diagnostic Center, Farmington Hills, Westland, MI
Millennium Orthopaedics, Farmington Hills, MI
Millennium Pulmonary & Sleep Clinic, Farmington Hills, MI
Mitchell Folbe MD PC, Troy, MI
Mohammad N. Alocozy, M.D., Sacramento, CA
Mount Carmel Health Partners, Columbus, OH
Mount Sinai, New York City, NY
Mountainview Family Practice, Grants Pass, OR
MultiCare, Tacoma, WA
Natomas Family Practice, Sacramento, CA
Nephrology Associates of Syracuse, Syracuse, NY
Nephrology Hypertension Associates of CNY, North Syracuse, NY
NEQCA Accountable Care, Inc., Braintree, MA
Neurological Consultants, Southfield, MI
NJPACO R, LLC, Palm Springs, FL
NOMS ACO, LLC, Sandusky, OH
NorCal Endocrinology & Internal Medicine, Roseville, CA
North Austin Family Medicine, PA, Austin, TX
North Carolina Internal Medicine, PC, Cary, NC
North Central Arizona Accountable Care, Prescott, AZ
North Raleigh Endocrinology & Diabetes Center, Raleigh, NC
North Raleigh Medical Center, Raleigh, NC

North Star Family Medicine P.A., Round Rock, TX
Northwest Brain and Spine (Caravan Health ACO), Bend, OR
Northwest Florida Health Partners, Pensacola, FL
Northwest Medical Specialties, Tacoma, WA
Northwest Ohio ACO, Toledo, OH
Novant Health, Charlotte, NC
NW Momentum Health Partners, Olympia, WA
Oakland Family Practice, Madison Heights, MI
Oakland Imaging and Diagnostic Center, Madison Heights, MI
Oakland Lung & Sleep Specialists, Auburn Hills, MI
Oakland Macomb Surgical Group, Madison Heights, MI
Oakland Medical Group, Royal Oak, MI
Oakland Neurologists, Troy, MI
Oakland Neurology Center, Rochester Hills, MI
Oakland Orthopedic Institute, Pontiac, MI
OB/GYN of Northern Indiana, South Bend, IN
Odessa Consultants, PLLC, Odessa, TX
Office of David L. Benkoff M.D., Southfield, MI
Office of Dr. Florek & Dr. Meyers, Bloomfield Hills, MI
Office of Felicia A. Ivascu M.D., Royal Oak, MI
Office of Geoffrey Saham M.D., Rochester Hills, MI
Office of Imad George M.D., Livonia, MI
Office of James Robbins M.D., Royal Oak, MI
Office of Jimmi Mangla, M.D., Royal Oak, MI
Office of Kaftan Langnas and Stashefsky, Madison Heights, MI
Office of Kathryn Zeigler M.D., Royal Oak, MI
Office of Krzysztof Warszawski M.D., Garden City, MI
Office of Lina Sakr, Troy, MI
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Office of Sheila Simpson M.D., Madison Heights, MI
Office of Vandad Raofi, M.D., Royal Oak, MI
Office of Wesley R. Barnes M.D., Royal Oak, MI
Ogden Clinic, PC, Ogden, UT
OH, Berkeley Heights, NJ
Oklahoma Cancer Specialists and Research Institute, Tulsa, OK
Oklahoma Health Initiatives (SJFI, LLC), Tulsa, OK
OneCare Vermont ACO, Colchester, VT
Optimus Healthcare Partners, Summit, NJ
Orlando Health Collaborative Care, Orlando, FL
Palm Beach ACO, West Palm Beach, FL
Pankaj J Patel M.D., P.A., Midland, TX

Park Place Family Practice, Taylor, MI
Parkway Primary Care, Austin, TX
Partnership for Health in the Berkshires, Pittsfield, MA
Parvez Islam, M.D., Roseville, CA
PathfinderHealth, LLC, Flagstaff, AZ
Patient Care Network of Oklahoma, Oklahoma City, OK
Paul E. Bristol, M.D., Austin, TX
Pediatrics Associates, South Bend, IN
Physicians Accountable Care of Utah, LLC, West Jordan, UT
Physician's Medical Clinic, McMinnville, OR
Physicians of Southwest Washington, Olympia, WA
Piedmont HealthCare Alliance ACO, Statesville, NC
Pleasanton Family Medicine, PLLC, Pleasanton, TX
Port Lavaca Clinic Associates, P.A., Port Lavaca, TX
PQN – Central Texas, LLC, Arlington, VA
Preferred Medical Group, Madison Heights, MI
Preferred Women's Health, Bingham Farms, MI
Premier Internists, Farmington Hills, MI
Primaria, Indianapolis, IN
Privia Quality Network Central Texas, LLC, Arlington, VA
Privia Quality Network Georgia, LLC, Tyrone, GA
Privia Quality Network Gulf Coast II, LLC, Houston, TX
Privia Quality Network, LLC, Arlington, VA
Progressive Health Care, P.C., Taylor, Berkley, Livonia, MI
Prominence Health Plan, Reno, NV
Pulmonary Sleep & Wellness Center, Pontiac, MI
Quality Health Alliance, Langhorne, PA
Quality Independent Physicians, Louisville, KY
Rajanikant Pandya M.D, Midland, TX
Rajesh J Patel, M.D., P.A., Odessa, TX
Raleigh Adult Medicine, Raleigh, NC
Raleigh Family Practice, P.A., Raleigh, NC
Raleigh Medical Group, Raleigh, NC
Redford Clinic, Redford, MI
Reliance ACO, Farmington Hills, MI
Reliance Next Gen ACO, Farmington Hills, MI
Rigoberto Barba, M.D., Woodland, CA
Rio Grande Valley Health Alliance, McAllen, TX
Riverton Clinic - Riverton, Riverton, UT
Rochester Medical Group, Rochester Hills, MI
Rocklin Family Practice & Sports Medicine, Rocklin, CA
Rocky Mount Family Medical Center, P.A., Rocky Mount, NC
Ronald Rasansky, D.O. & Stephen Hoffman, D.O., Madison Heights, MI
Rush Health ACO, Chicago, IL
Ryan Medical Associates, P.C., Warren, MI
Saint Alphonsus Health Alliance, Boise, ID

Sammy Lerma III, MD, PA, Bastrop, TX
Sayed A. Hussain, M.D., Roseville, CA
SBMACO, LLC, Jonesboro, AR
Scripps Accountable Care Organization, San Diego, CA
Select Health Network, Mishawaka, IN
Select Physicians Associates ACO, Tampa, FL
SERPA ACO, LLC, Crete, NE
Seton Accountable Care Organization, Inc., Austin, TX
Shah And Associates Family Practice, Cary, NC
Shroff Cardiology & Internal Medicine Clinic Pa, Big Spring, TX
Shylesh Ganta M.D., P.A, Midland, TX
Signify Health, Dallas, TX
Silver Pine Medical Group - Chesterfield Office, Chesterfield, Romeo Plank Office (Macomb), Sterling Heights, MI
Silver State (ACO), Las Vegas, NV
Sockolov & Sockolov, Sacramento, CA
South Macomb Internal Medicine, Warren, MI
South Macomb Internists, Warren, MI
South San Antonio Medical Associates, San Antonio, TX
South Texas Clinical Partners (ACO), McAllen, TX
South Texas Internal Medicine Associates, San Antonio, TX
Southern Kentucky Health Care Alliance, Smiths Grove, KY
Southern New England Healthcare Organization, Hartford, CT
St Joseph Regional Health Partners ACO, Bryan, TX
St Vincent's Accountable Care Organization LLC, Jacksonville, FL
St. Elizabeth Physicians, Edgewood, KY
Sterling Physicians, Sterling Heights, MI
Subodh K Mallik, MD, Ft. Stockton, TX
Sumant A Kumar M.D, Weatherford, TX
Summa Health, Akron, OH
Summit Medical Group- NJ/CityMD, Berkeley Heights, NJ
Suresh Prasad Md PA, Odessa, TX
Sutter Health, Sacramento, CA
Syracuse ENT Surgeons, Dewitt, NY
Syracuse Orthopedic Specialists, PC, Syracuse, NY
TC2, Macon, GA
Texas Panhandle Clinical Partners (ACO), King of Prussia, PA
Texoma Clinical Partners (ACO), King of Prussia, PA
The Center for Cancer and Blood Disorders, Fort Worth, TX
The Doctor's In, Inc., Roseville, CA
The MetroHealth System, Cleveland, OH
The South Bend Clinic Allergy and Immunology, South Bend, IN
The South Bend Clinic at Granger, Granger, IN
The South Bend Clinic Audiology, South Bend, IN
The South Bend Clinic Cardiology, South Bend, IN
The South Bend Clinic Day Road, Mishawaka, IN

The South Bend Clinic Dermatology, Mishawaka, South Bend, IN
The South Bend Clinic Dietician, South Bend, IN
The South Bend Clinic Endo, South Bend, IN
The South Bend Clinic ENT, South Bend, IN
The South Bend Clinic Gen Surg & Vascular, South Bend, IN
The South Bend Clinic GI, South Bend, IN
The South Bend Clinic Granger Family Medicine, Granger, IN
The South Bend Clinic Immediate Care, South Bend, IN
The South Bend Clinic Internal Medicine, South Bend, Granger, IN
The South Bend Clinic Ironwood, South Bend, IN
The South Bend Clinic New Carlisle, New Carlisle, IN
The South Bend Clinic OBGYN, South Bend, Granger, IN
The South Bend Clinic Ophthalmology, South Bend, IN
The South Bend Clinic Ortho, South Bend, IN
The South Bend Clinic Pediatrics, South Bend, Granger, IN
The South Bend Clinic Physical Therapy, South Bend, IN
The South Bend Clinic PMR, South Bend, IN
The South Bend Clinic Podiatry, Mishawaka, IN
The South Bend Clinic Portage, South Bend, IN
The South Bend Clinic Radiology, South Bend, IN
The South Bend Clinic Rheumatology, South Bend, IN
The South Bend Clinic Urology, South Bend, IN
The South Bend Clinic, South Bend, IN
ThedaCare, Appleton, WI
Thomas Hopkins, M.D., Roseville, CA
Three Rivers Health, Three Rivers, MI
Tooele Clinic - Tooele, Tooele, UT
Torrance Memorial Integrated Physicians, Torrance, CA
Triad HealthCare Network, Greensboro, NC
Trinity Health Accountable Care Organization, Livonia, MI
Trinity Health of New England ACO, Hartford, CT
Trinity Integrated Care, Livonia, MI
UC San Diego Health Accountable Care Network, La Jolla, CA
UMass Memorial Accountable Care Organization, Worcester, MA
UNC Senior Alliance, Morrisville, NC
UnityPoint Accountable Care, West Des Moines, IA
Universal Health Services, King of Prussia, PA
Urology Associates of South Bend, South Bend, IN
USMM Accountable Care Partners, Troy, MI
UT Health San Antonio Regional Physician Network, San Antonio, TX
Utah Physicians Quality Care, Salt Lake City, UT
UW Health ACO, Madison, WI
Valley Medical Center, Renton, WA
Vikram Vadyala, MD, Midland, TX
VillageMD, Chicago, IL
Vista Complete Care, Auburn, CA

Wake Endoscopy, Raleigh, Clayton, NC
Wake Gastroenterology, Raleigh, NC
Wake Internal Medicine & Pediatrics, Raleigh, NC
Wake Internal Medicine Consultants, Inc., Raleigh, NC
Wake Pediatric Gastroenterology, Raleigh, NC
Wake Sports Medicine, Raleigh, NC
Wake Women's Health, Raleigh, NC
Wasatch Clinic - Millcreek, Salt Lake City, UT
Waverly Primary Care, Cary, NC
West Jordan Clinic, Bldg. A / Bldg. B - West Jordan, West Jordan, UT
West Michigan Accountable Care Organization, Grand Rapids, MI
West Tennessee Clinical Partners, Louisville, KY
Western Wake Wellness, Cary, NC
Westland Clinic, Westland, MI
Westland Healthcare, Westland, MI
Wilderness Health, Two Harbors, MN