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NAACOS Statement on CMS Innovation Center's Making Care Primary Model Attributed to Clif Gaus, Sc.D., President and CEO of the National Association of ACOs

NAACOS is committed to increasing investment in primary care and <u>has called</u> for CMS to establish an option for ACOs to implement population-based payments for primary care. The approach we've offered would help CMS meet its stated goal of putting all beneficiaries in a relationship with a provider responsible for total cost of care and quality while increasing investment in primary care.

The Making Care Primary Model is counter to these goals by excluding practices who work in an ACO. While aspects of the new model are positive, practices should not be forced to choose between Making Care Primary and participating in an ACO. Within ACOs, primary care practices are the quarterback of care teams, but they must work with providers across the care continuum to achieve quality outcomes and cost savings. Working with ACOs has proven to be beneficial to primary care practices, and ACOs with practices concurrently participating in primary care models, such as Primary Care First or the Maryland Primary Care Program, are the most successful.

To continue the shift to total cost of care models like ACOs, CMS needs to allow concurrent participation or make comparable options within the Medicare Shared Savings Program to coincide with the start of Making Care Primary. In the absence of a population-based payment option for ACOs, practices may choose to move to Making Care Primary rather than remaining in total cost of care models.

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About NAACOS. The National Association of ACOs (NAACOS) represents more than 8 million beneficiary lives through Medicare's population health-focused payment and delivery models. NAACOS is a member-led and member-owned nonprofit of more than 400 ACOs in Medicare, Medicaid, and commercial insurance working on behalf of health systems and physician provider organizations across the nation to improve quality of care for patients and reduce health care cost.