

May 12, 2025

The Honorable Dr. Mehmet Oz
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services

Dear Administrator Oz:

The undersigned organizations write to express our concern regarding the predictability and accuracy of benchmarking in the Medicare Shared Savings Program (MSSP). **We strongly urge the Centers for Medicare & Medicaid Services (CMS) to use its existing authority to reduce the weight of the Accountable Care Prospective Trend (ACPT) to zero for agreement periods beginning in 2024 and 2025.**

If this pressing issue is not rectified, it will have long-term, negative consequences on the Shared Savings Program and primary care innovation. We have two significant concerns with how the ACPT has been implemented for ACOs in 2024:

First, despite the intention for this to be a *prospective* policy, ACOs were not given the 2024 ACPT until eleven months into the performance year. This effectively made the ACPT a retrospective adjustment that ACOs could not plan for or try to mitigate during the course of the performance year.

Second, the ACPT *significantly* underestimated Medicare cost growth. While the 2024 ACPT estimated Medicare cost growth to be 4.9%, actual growth was nearly double (8%).¹ This means that the ACPT will artificially and unfairly reduce ACO benchmarks by 1.03%,² which, for the average ACO could reduce earned revenue by 25%. Significantly underfunding ACOs will force ACOs to reconsider their approaches for managing patients, reducing the burden of chronic illness, and providing patients with services that promote wellness but are not typically covered by Medicare.

CMS has the regulatory authority to reduce the weight of the ACPT in the event of unforeseen circumstances such as these. **We urge you to use that authority to pause ACPT implementation and work with stakeholders to improve MSSP benchmarking policy for future years.**

Thank you for your attention to this important issue.

Sincerely,

National Association of ACOs
America's Physician Groups
ACC of Georgia
ACC Quality Health II

¹ Milliman (2025), "Predictability vs. accuracy in MSSP benchmarks."

² $(8.0 - 4.9\%) * \frac{1}{3} = 1.03\%$

ACME Health Partners ACO
AdvantagePoint Health Alliance – Bluegrass, LLC
AdvantagePoint Health Alliance – Blue Ridge, LLC
AdvantagePoint Health Alliance – Hot Springs, LLC
AdvantagePoint Health Alliance – Laurel Highlands, LLC
AdvantagePoint Health Alliance – Northwest, LLC
AdvantagePoint Health Alliance – Tennessee Valley, LLC
AdvantagePoint Health Alliance – Western North Carolina, LLC
AdventHealth
Adventist Health
Advocate Health
agilon health
Aledade
Alliance for Integrated Care of New York
Arizona Care Network
Ascension
Ascension St. John ACO
Astrana Health
Atlantic Health System
Augusta Care Partners, LLC
Avera Health
Baptist Health (Arkansas)
Baylor Scott & White Health
Bluestone Physician Services
Bon Secours Mercy Health
Buena Vida y Salud LLC
Care Partners ACO LLC
CareAllies Accountable Care Solutions LLC
CCA Health ACO
Central Florida ACO
CHESS Health Solutions
Cleveland Clinic
CNY Foot Surgery and Podiatry Care
Coastal Carolina Health Care, PA
Commonwealth ACO
Community Care Collaborative of PA & NJ
Community Care Cooperative
Community Care Partnership of Maine
Community Health Provider Alliance
Cotton-O’Neil ACO LLC
Dupre Medical Clinic
Eastside ACO

EPC ACO
Essentia Health
Family Health ACO
Freedom Healthcare Alliance, LLC
GenieMD Medical Group
Health Choice Network
Health First Physicians ACO
Healthcare Solutions Network
HealthPartners
Holy Name
IHCI ACO LLC
IHCI ACO Midwest LLC
Innovaccer Inc.
Innovation Care Partners
Integra Community Care Network, LLC
INTEGRIS Health
Invio Health Network
Jefferson Health
KPC Excel
Lancaster General Health Community Care Collaborative
Liberty Doctors, LLC
LTC ACO
MaineHealth ACO
Mary Washington Health Alliance LLC
Mass General Brigham
Medical Home Network
Memorial Health Partners ACO
Mid-Atlantic ACO
Mission
Missouri Health Center ACO
Morris Hospital and Healthcare Centers
Mount Sinai Health Partners
MultiCare Connected Care
Nebraska Health Network
New England Orthopaedic Center
Nivano Physicians Inc ACO REACH
North Georgia Healthcare Partnership, Inc.
Northeast Partners
Novant Health
NW Momentum Health Partners ACO
NYQC
NYQuality Care

Ochsner Accountable Care Network
On Belay Health Management Services, LLC
On Belay Health Solutions
Optum
Orlando Health
PA Clinical Network
PBACO Holding, LLC
Pearl Health, Inc.
Penn Medicine
Premier Health ACO LLC
Primary Care Alliance
Primary Partners
Prime Care Managers
Privia Health
Privia Medical Group
Privia Medical Group North Texas
Privia Quality Network
Providence St. Joseph
PSW
SoNE Healthcare
Sound Long-Term Care Management
Southeast Quality Network
Space Coast ACO
Stellar Health ACO LLC
Summit Health-VillageMD
Sun River Health
Team ACO
Trinsic Clinically Integrated Network
TriValley Primary Care
Tryon ACO, LLC
Tryon Medical Partners
UChicago Medicine
UNC Senior Alliance/UNC Health
United Physicians, INC
UnityPoint Accountable Care
VBLTC, LLC
VillageMD
WellSpan Health
Wellvana
West Florida ACO