



**Testimony Prepared for the U.S. House Appropriations Subcommittee on  
Labor, Health and Human Services, Education, and Related Agencies**

**Submitted by: Clif Gaus**

**President and Chief Executive Officer (CEO), the National Association of Accountable Care  
Organizations (NAACOS)**

**April 8, 2019**

Thank you Chairwoman DeLauro, Ranking Member Cole, and members of the Subcommittee for the opportunity to provide written testimony on behalf of NAACOS, the largest association of ACOs. Representing more than 5 million beneficiary lives through 330 Medicare Shared Savings Program (MSSP), Next Generation Model, and commercial ACOs, NAACOS requests that the Subcommittee include report language in the FY 2020 LHHS-ED funding bill that would:

- **Encourage the Centers for Medicare and Medicaid Services (CMS) to ensure the process for the development of new healthcare delivery and payment models, and modifications to existing models, by the Centers for Medicare and Medicaid Innovation (Innovation Center) is transparent and open for stakeholder comment prior to publication of such models.**

Congress established the Innovation Center to test different delivery and payment models to improve quality and reduce costs in Medicare and Medicaid. Today there is no standard process, however, for public input on Innovation Center model development, which can be especially concerning in the case of mandatory models. The Innovation Center often

communicates changes through contract amendments, sometimes in the middle of a performance year.

Last month, NAACOS joined 8 healthcare organizations sending a letter to CMS officials highlighting that the Innovation Center’s work needs a public process to allow stakeholder comment on all model design elements prior to finalizing the model.<sup>1</sup> Model changes also need to be made and communicated clearly and publicly.

Earlier this year, House Ways and Means Committee leaders Richard Neal (D-MA) and Kevin Brady (R-TX) also called for greater transparency in the Innovation Center’s work, saying its model-development process has “historically been opaque to Congress and to stakeholders.”<sup>2</sup>

There is a wealth of expertise from those on the front lines of healthcare delivery and payment transformation—knowledge that should be solicited throughout a more public process of developing and updating models. NAACOS appreciates this opportunity to provide the Subcommittee with testimony on ways to improve transparency in the development of value-based payment models. We look forward to working with you.

---

<sup>1</sup> <https://www.naacos.com/assets/docs/pdf/2019/CMMI-Letter3.26.19.pdf>

<sup>2</sup> <https://waysandmeans.house.gov/sites/democrats.waysandmeans.house.gov/files/documents/Neal-Brady%20letter%20to%20CMS%20re%20CMMI%202019-01-09.pdf>