



June 19, 2018

Ms. Seema Verma
Administrator
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
Hubert H. Humphrey Building
200 Independence Avenue, S.W.
Washington, DC 20201

Re: 2019 Medicare Shared Savings Program Application Timeframe and Process

Dear Administrator Verma:

The National Association of ACOs (NAACOS) writes this letter to express our significant concern with the lack of information from the Centers for Medicare & Medicaid Services (CMS) regarding the application process for ACOs interested in applying for the 2019 Medicare Shared Savings Program (MSSP). As you know, typically the application process begins with a Letter of Intent to Apply (LOIA) which has typically been due in the spring. Given that we are in the latter half of June, ACOs are growing anxious that a condensed application timeline will result in unrealistic expectations for ACOs to gather information and submit application materials to CMS.

The absence of information from CMS has led some ACOs to believe there will not be an opportunity to apply for a 2019 program start. Many others are growing wary of the allotted time for organizations to analyze any program changes, review application materials, make decisions regarding their participation and gather all of the required information to submit applications for participation. ***We urge CMS to provide more information regarding the expected timeline for 2019 applications so that organizations and their Board of Directors may begin to prepare for what looks to be a condensed application timeline.*** As ACOs weigh their participation options for 2019, it is critical that organizations are given sufficient time to analyze potential program changes which may result from the proposed regulation currently under review by the Office of Management and Budget, "Medicare Shared Savings Program; Accountable Care Organizations (CMS-1701-P)."

We fear if CMS does not provide more transparent information as soon as possible regarding the application timeline at a minimum, it may deter participation from ACOs and result in a scaled back 2019 ACO cohort. Many ACOs are not only weighing their MSSP participation but also participation in other programs which have their own deadlines quickly approaching. As the largest association of ACOs, representing more than 5 million beneficiary lives through more than 330 MSSP, Next Generation, and commercial ACOs, we urge CMS to release information to the public regarding the expected application deadlines immediately. ACOs across the nation have worked tirelessly to improve the quality of Medicare delivery, population health and outcomes, and health care cost efficiency. To lose the momentum of these organizations would be a terrible loss for the agency, the Medicare program and for our health care system.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clif Gaus', with a long horizontal flourish extending to the right.

Clif Gaus, Sc.D.

President and CEO

National Association of ACOs