

October 18, 2023

The Honorable Patrick McHenry
Speaker Pro Tempore
U.S. House of Representatives
H-232, The Capitol
Washington, DC 20515

The Honorable Charles Schumer
Majority Leader
U.S. Senate
S-221, The Capitol
Washington, DC 20510

The Honorable Hakeem Jeffries
Democratic Leader
U.S. House of Representatives
H-204, The Capitol
Washington, DC 20515

The Honorable Mitch McConnell
Republican Leader
U.S. Senate
S-230, The Capitol
Washington, DC

Re: Extend Medicare Advanced Alternative Payment Model Incentive Payments

Dear Speaker Pro Tempore McHenry, Leader Jeffries, Leader Schumer, and Leader McConnell:

On behalf of the 24 undersigned physician and health care associations and over 600 health systems, hospitals, physician practices, health clinics, and accountable care organizations (ACOs), thank you for your leadership in ensuring that physicians and other clinicians have adequate resources to care for the health of the U.S. population. As Congress considers priority end-of-year legislation, we ask that you bolster and advance the ongoing transition to value-based payment models by extending the 5 percent advanced alternative payment model (APM) incentive payments for clinicians that were authorized under the Medicare Access and CHIP Reauthorization Act of 2015 (MACRA).

Eight years ago, Congress passed MACRA to shift how Medicare pays clinicians for health care services. Key goals were to encourage keeping patients healthy, reducing unnecessary care, and lowering costs for both patients and taxpayers. APMs have demonstrated that when physicians and other clinicians are held accountable for costs and quality and provided flexibility from fee-for-service (FFS) constraints, they can generate savings for taxpayers and improve beneficiary care.

Recognizing that FFS payments alone are not sufficient to cover the expenses associated with building and maintaining the necessary infrastructure to engage in wholesale care delivery redesign, MACRA included 5 percent incentive payments to enable clinicians to transition to advanced APMs (i.e., down-side risk APMs). This strategy has proven successful as participation in advanced APMs has grown by more than 173 percent with nearly 300,000 clinicians.¹

The advanced APM incentive payments have allowed clinicians to cover some of the investment costs of moving to new payment models, including expanding care teams, developing programs to improve beneficiary care, and adopting population health infrastructure. Incentives also help to improve care for patients by giving clinicians financial resources to expand services beyond those covered by traditional Medicare.

With the eligibility to earn advanced APM incentive payments set to expire at the end of 2023, progress towards value-based care could stall further. Absent Congressional intervention, physicians and other clinicians will be more likely to remain in MACRA's Merit-based Incentive Payment System (MIPS), which is burdensome, presents participants with financial costs associated with compliance and quality assurance measures, and does little to accurately assess improvements in health care outcomes. Moreover, some physicians currently in advanced APMs may be pushed back into MIPS because of increasing qualification thresholds, while others may choose to voluntarily shift back to MIPS because the program will continue to offer opportunities for high

¹ <https://qpp-cm-prod-content.s3.amazonaws.com/uploads/2433/2021%20QPP%20Experience%20Report.pdf>

performing APMs to qualify for MIPS adjustments in the coming years. The prospect of remaining in, or moving to, MIPS is particularly daunting as clinicians are slated for a 3.36 percent Medicare Part B payment cut stemming from the provisions in the Calendar Year 2024 Medicare Physician Fee Schedule Proposed Rule. Unless Congress intercedes, these payment reductions will take effect on January 1, 2024.

In recognition of our commitment to helping physicians and other clinicians move away from MIPS and advance Medicare's transition to accountable care, we urge you to include Section 3 of the Value in Health Care Act (H.R. 5013) in any end-of-year legislative package. This bipartisan legislation includes a two-year extension of MACRA's original 5 percent advanced APM incentives and adjusts the one-size-fits-all approach to revenue qualification thresholds to ensure that physicians and other clinicians continue to participate in APMs. These two crucial policy changes will help facilitate the continued transition to advanced APM arrangements while gradually increasing the associated revenue qualifications for incentive payments.

Lastly, Medicare's advanced APM incentives are a good return on investment. In 2022, ACOs produced \$1.8 billion in savings that was returned to Medicare.² This savings is significantly more than the \$644 million paid in incentives this year.³ APMs may also be helping to slow the growth in health care spending in Medicare and beyond. The Congressional Budget Office (CBO) released data earlier this year showing that actual 2022 federal spending on Medicare and Medicaid was 9 percent lower than original projections.⁴ Some of the features that characterize participation in APMs, such as improved care management and more efficient use of technology, are among factors that may have contributed to these lower-than-expected costs.

We ask you to advance this important legislation, which will give our organizations the flexibility and financial security needed to innovate care, improve the health of our populations, and lower health care costs.

We appreciate your consideration of this matter.

Sincerely,

American Medical Association
AMGA
National Association of ACOs
Accountable for Health
American Academy of Neurology
American College of Physicians
American Society for Radiation Oncology
America's Essential Hospitals
Association of American Medical Colleges
Federation of American Hospitals
National Rural Health Association
Primary Care Collaborative

America's Physician Groups
Health Care Transformation Task Force
Premier Inc.
American Academy of Family Physicians
American Association of Orthopaedic Surgeons
American Osteopathic Association
American Society of Nephrology
Association for Clinical Oncology
Association of Community Cancer Centers
Medical Group Management Association
Partnership to Empower Physician-Led Care
The Society of Thoracic Surgeons

cc:

Chairwoman Cathy McMorris Rodgers
Chairman Jason Smith
Chairman Jodey Arrington
Chairman Ron Wyden
Chairman Sheldon Whitehouse

Ranking Member Frank Pallone
Ranking Member Richard Neal
Ranking Member Brendan Boyle
Ranking Member Mike Crapo
Ranking Member Charles Grassley

² <https://www.cms.gov/newsroom/press-releases/medicare-shared-savings-program-saves-medicare-more-18-billion-2022-and-continues-deliver-high>

³ https://qpp-cm-prod-content.s3.amazonaws.com/uploads/2517/QPCount_IncentivePayments.pdf

⁴ <https://www.cbo.gov/system/files/2023-03/58997-Whitehouse.pdf>

Health Systems, Hospitals, Physician Practices, Health Clinics, and ACOs

Accountable Care Coalition of Direct Contracting, LLC; AZ, CA, CO, CT, FL, GA, IL, MA, MI, NJ, NM, NY, OH, PA, TN, TX, UT, VA

Avera Health; Sioux Falls, SD, MN, IA, NE

Banner Health; Phoenix, AZ, CA, CO, NE, NV, WY

Bellin and Gundersen Health System; Madison, WI, MN, IA, MI

Bluestone Physician Services; Stillwater, MN, WI, FL

Caravan Collaborative ACO 22; AL,AR,AZ,CA,CT,FL,GA,HI,IA,ID,IL,IN,KY,LA,MI, MN,MO,MT,NC,ND,NE,NJ,NM,NY,OR,PA,SD,TX,WA,WI,WV,WY

Caravan Collaborative ACO 50; AR,CA,CO,GA,GU,IA,ID,IL,IN,KY,LA,MA,MI,MN,MO,MT,NC,ND,NE,OH,OR,TX,WA,WI,WV,WY

Care New England Medical Group; East Greenwich, RI, MA, CT

CareConnectMD ACO; CA, MI, SD, OH, IN, NY, TX, GA, FL, SC, NC, NE

Clover Health; NJ, FL, OK, NE, MO, IL, GA, KS, NM, TX

Collaborative Health Systems; AZ, CA, CO, CT, DC, FL, GA, IL, MA, MD, MI, NJ, NM, NY, OH, PA, TN, TX, UT, VA, WI

CommonSpirit Health; IL, AR, AZ, CA, CO, GA, IA, IN, KS, KY, MN, ND, NE, NM, NV, OH, OR, PA, TN, TX, UT, WA, WI

Community Care of Brooklyn; New York, NY

DaVita; (National)

Essentia Health; Duluth, MN; WI; ND

Evolut Care Partners / The Accountable Care Organization, Ltd; CA, FL, IN, KS, KY, MI, NC, NY, TX, UT

HarmonyCares ACO; Troy, MI, OH, PA, VA, FL, TX, WA, MO, WI, IL, IN, GA

Health Choice Care; Miami, FL, HI, MO, NC, RI

ilumed, LLC; Jupiter, FL, SC, AL, WV, KY, OH, TX, NJ, NY, TN

Imperium Health; Louisville, KY, OK, AL, LA, FL, PA, CA, UT, NV, VA, AR, AK, TX, TN

Intermountain Health; UT; ID, NV, CO, MT

Jefferson Health, Philadelphia, PA & NJ

Lumeris; MO, OH, CA, GA

Mayo Clinic; MN, AZ, FL, IA, WI

On Belay Health Solutions; MA; OR, CA, SD, NE, TX, FL, GA, TN, VA, IN, OH, PA, NJ, ME, RI

Prominence Health; CA; NV; TX; FL; DC; SC; OK

Providence; AK, WA, OR, CA, MT, TX, NM

Responsive Care Solutions; Sarasota, FL; MN, OH, AK, DE, TN, CO

Saint Alphonsus Health Alliance; Boise, ID & OR

Southeast Medical Group, PC, Atlanta, GA; AL & TN

Trinity Health Integrated Care, LLC; MI, IL, OH, PA, DE, IN, ID, FL, NY

Trinity Health Mid Atlantic; PA, DE

Trinity Health; MI ID, NY, PA, FL, DE, IL, OH, IA, CT, MA

Upstream; NC, VA, SC

USMM Accountable Care Partners; MI, OH, PA, VA, FL, GA, TX, MO, WA, WI, IL, IN

Valley Health System; VA; WV

Vanderbilt Health Affiliated Network; TN, KY

VillageMD; OR, NV, AZ, CO, TX, IL, IN, MI, KY, GA, FL, NJ, RI, MA, NH

Votion ACO; FL, GA, AL, TX, SC, MI, OK, TN, MS

Wellvana; TN VA, WI, MI, GA, FL, CA, TX, LA, NY, SC, NC, AR, MO, OH, OK, KS, AZ, NM

Aaron M. Roland, M.D.; Burlingame, CA

Abimbola M. Banjo M.D. P.A.; Pleasanton, TX

Access Family Medicine of Sacramento; Sacramento, CA

Accountable Care Coalition of Georgia, LLC.

Accountable Care Coalition of Northeast Partners, LLC
Accountable Care Coalition of Southeast Texas, Inc.
Accountable Care Coalition of Southeast Wisconsin, LLC
Advance Family Practice, LLC; Florida
AdvantagePoint Health Alliance, LLC
AdvantagePoint Health Alliance, LLC - Blue Ridge
AdvantagePoint Health Alliance, LLC - Bluegrass
AdvantagePoint Health Alliance, LLC - Hot Springs
AdvantagePoint Health Alliance, LLC - Laurel Highlands
AdvantagePoint Health Alliance, LLC - Northwest
AdvantagePoint Health Alliance, LLC - Tennessee Valley
AdvantagePoint Health Alliance, LLC - Western North Carolina
AdventHealth; Orlando, FL
Adventist Health, Roseville, CA
Advocate Health; Oak Lawn, IL, WI, GA, NC, SC
agilon health, Texas
Aledade Accountable Care 101, LLC
Aledade Accountable Care 102, LLC
Aledade Accountable Care 103, LLC
Aledade Accountable Care 12, LLC
Aledade Accountable Care 128, LLC
Aledade Accountable Care 143, LLC
Aledade Accountable Care 147, LLC
Aledade Accountable Care 149, LLC
Aledade Accountable Care 15, LLC
Aledade Accountable Care 16, LLC
Aledade Accountable Care 22, LLC
Aledade Accountable Care 25, LLC
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Aledade Accountable Care 61, LLC
Aledade Accountable Care 79, LLC
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Aledade Accountable Care 91, LLC
Aledade Accountable Care 92, LLC
Aledade Accountable Care 93, LLC
Aledade Accountable Care 94, LLC
Aledade Accountable Care 98, LLC

Aledade Accountable Care 99, LLC
Aledade Arkansas ACO, LLC
Aledade Delaware ACO LLC
Aledade Duwamish ACO, LLC
Aledade Florida Central ACO, LLC
Aledade Kansas ACO, LLC
Aledade Louisiana ACO, LLC
Aledade Mississippi ACO, LLC
Aledade Primary Care ACO LLC
Aledade West Virginia ACO, LLC
Aledade, Bethesda, MD
Aledo Family Medicine; Aledo, TX
Alicia W Grossmann M.D. Pa; Austin, TX
Alignment Health; Orange, CA
Alleghany Health; Sparta, NC
Allen Parish Community Healthcare; Kinder, LA
Altamonte Family Practice; Florida
Amin Medical Center; Skippack, PA
AMITA Health ACO, Chicago, IL
AmpliPHY of Kentucky ACO LLC
Andre K.S. Tse, M.D. PA; Jacksonville, NC
AnMed; Anderson, SC
Ann Arbor Endocrinology; Ann Arbor, MI
Ann H. Snyder, M.D., PA; McKinney, TX
Anna Abalos, M.D.; Roseville, CA
Antone Internal Medicine and Associates; Southfield, MI
Apex Primary Care; Florida
Apple Hill Podiatry Associates PC; Pennsylvania
Aquino Integrative Internal Medicine; Roseville, MI
Arbor Ypsi Foot & Ankle Center; Ann Arbor, MI
Arcadia Solutions, LLC; Burlington, MA
Arcare, Augusta, AR
Archbold Medical Center; Thomasville, GA
Arkansas Health Network; Little Rock, AR
Arthur Powell, M.D.; Bingham Farms, MI
Ascension Saint Thomas; Nashville, TN
Ascension; St. Louis, MO
Associated Endocrinologists; Farmington Hills, MI
Associated Family Physicians, Inc.; Sacramento, CA
Associates in Internal Medicine; West Bloomfield, MI
Associates in Physical Medicine & Rehab; Ypsilanti, MI
Assurity DCE, LLC; Trinity, FL
Atlantic Accountable Care Organization; Morristown, NJ
AtlantiCare; Atlantic City, NJ
Auburn Hills Medical Clinic; Auburn Hills, MI
Auburn Medical Group, Inc.; Auburn, CA
Azelvandre Family Practice; Florida

Baptist Health Quality Network; Coral Gables, FL
Baptist Health South Florida; Miami, FL
Barrett Hospital & Healthcare; Dillon, MT
Bay Family Medical Group; San Mateo, CA
Baycare Healthcare Partners; Springfield, MA
Be Well Medical Center; Berkley, MI
Beartooth Billings Clinic; Red Lodge, MT
Beaumont ACO; Southfield, MI
Bellin Health Partners; Wisconsin, MI
Bensalem Medical Practice, PC; Bensalem, PA
Beth Hanrahan, MD LLC; Florida
Better Health Group; Tampa FL
Bibb Medical Center; Centerville, AL
Billings Clinic; Billings MT
BJC Accountable Care Organization; St. Louis MO
Block, Nation, Chase & Smolen Family Medicine; Florida
Bloom Healthcare; Wheat Ridge, CO
Bluerock Care; Washington, DC
Bluestem Health; Lincoln, NE
BoiceWillis Clinic, P.A.; Rocky Mount, NC
Bond Clinic, P.A.; Winter Haven, FL
Bradon Kimura MD Inc; Kealahou, HI
Bridges Health Partners, LLC; Warrendale, PA
Bucks Family Medical Associates P.C.; Newtown, PA
BuxMont Medical Associates, PC; Warrington, PA
Cancer Care Associates of York Inc; Pennsylvania
Capital Family Medicine; Raleigh, NC
Capital Family Physicians, P.A.; Raleigh, NC
Capitol Internal Medicine Associates; Carmichael, CA
Caravan Rural Health ACO, Colorado
Cardiology and Vascular Associates, P.C.; Bloomfield Hills, MI
CareConnectMD, Inc.; Costa Mesa, CA
Carilion Clinic; Roanoke, VA
Carle Health; Champaign, IL
Carrboro Family Medicine Center, PA; Carrboro, NC
Cary Healthcare Associates, P.A.; Cary, NC
Cary Internal Medicine and The Diabetes Center; Cary, NC
Cary Medical Group; Cary, NC
Casillas Medical and Wellness; Florida
Central Bucks Family Practice; Jamison, PA
Central Florida ACO, LLC; New Port Richey, FL
Central Montana Medical Center; Lewistown, MT
Central Virginia Coalition of Healthcare Providers, LLC dba JerichoREACH ACO
Centrus Health Kansas City; Westwood, KS
Centry Valley Community Partners LLC; Modesto, CA
Chambersburg Health Services; Pennsylvania
Charles E Schalger, MD LTD d/b/a Family Health Associates; Pennsylvania

CHES Health Solutions; Winston-Salem, NC
Cheyenne Regional; Cheyenne, WY
CHI Health Partners; Omaha, NE
Christiana Care Quality Partners ACO, LLC d/b/a eBrightHealth ACO; Wilmington, DE
Christie Clinic, PLLC; Champaign, IL
Christine Meyer, MD And Ass; Exton, PA
Christopher Greater Area Rural Health Planning Corporation; West Christopher, IL
Christus Health; Texarkana, TX
City Healthcare; Florida
Civitas Networks for Health; National
Clark Fork Valley Hospital; Plains, MT
Clarkston Internal Medicine; Clarkston, MI
Clarkston Medical Group; Clarkston, MI
Clarkston Medical Group; Oxford, MI
Clermont Medical Center; Florida
Cleveland Clinic; Cleveland, OH, FL, NV
Clover Fork Outpatient Medical Project; Evarts, KY
CNY Family Care, LLP; East Syracuse, NY
CNYAIM / IHANY; Syracuse, NY
Coal Country Community Health Center; Center, ND
Coastal Carolina Quality Care, Inc.; New Bern, NC
Commonwealth Primary Care ACO LLC; Phoenix, AZ
Commonwealth Primary Care; Richmond, VA
Community Care Collaborative; Huntingdon Valley, PA
Community Health Center of Lubbock, Inc.; Lubbock, TX
Community Health Provider Alliance, Denver, CO
Community Healthcare Partners ACO; Munster, IN
Community Memorial Healthcare; Ventura, CA
Community Memorial Hospital; Hamilton, NY
Complete Care Family Medicine Associates; Florida
Cone Health, Greensboro, NC
ConnectAmerica; Bala Cynwyd, PA
Conrad and Lieberman, MDs; Chester, PA
Coordinated Healthcare Services, P.A.; Plano, TX
Core Physicians, LLC / NH Cares ACO; Exeter, NH
Coulee Medical Center; Grand Coulee, WA
Cumberland Center for Healthcare Innovation, LLC (CCHI); Cookeville, TN
Dallastown Medical Associates LLP; Pennsylvania
Dana Kerner LLC; Southampton, PA
David Bene, MD; Pennsylvania
David Fivenson, MD, Dermatology, PLLC; Ann Arbor, MI
David Paul Adams, M.D., P.A.; Cary, NC
Dawei Zheng, M.D.; Sacramento, CA
Deaconess Care Integration LLC; Evansville, IN
Delaware Valley ACO; Radnor, PA
Delikat Family Practice; Florida
Dennis S. Gray, M.D.; Louisville, KY

Devamani Gowda, M.D.; Roseville, CA
Dewitt Clinic, Alvin, TX
DHR Health; Edinburg, TX
Dina Sverdlov, M.D.; San Mateo, CA
Doctors ACO, LLC; Athens, GA
Doctors Emergency Service, PA; Annapolis, MD
Dominion Medical Associates, P.A.; Austin, TX
Douglas Young, M.D., Inc; Sacramento, CA
Dover Shores Family Practice, LLC; Florida
Doylestown Medical Associates, P.C.; Doylestown, PA
Doylestown Value Partners; Doylestown, PA
Drs. Borders and Associates; Lexington, KY
Drs. Elias & Oakley, MD PA; Florida
Duke Connected Care; Durham, NC
Duly Health and Care; Wheaton, IL
Eastpointe Family Physicians; Eastpoint, MI
Elkins Park Family Medicine; Elkins Park, PA
Equality Health Direct; Phoenix, AZ
Esse Health ACO; St. Louis, MO
Evolent Care Partners; Raleigh, NC
Family First Health Corporation; Pennsylvania
Family First Primary Care, PLLC; Wake Forest, NC
Family Health Care Center; Royal Oak, MI
Family Health West; Fruita, CO
Family Medical Center of Georgetown, P.A.; Georgetown, TX
Family Medical Center; Florida
Family Medical Center; Orlando, Florida
Family Medical Specialist of Florida, PLC; Florida
Family Medicine & Ambulatory Care Center; Fair Oaks, CA
Family Medicine Clinic, PC
Family Medicine Clinic; Pearsall, TX
Family Practice; Warren, MI
Feasterville Family Practice, LLP; Holland, PA
First Care Health Center; Park River, ND
Florida Accountable Care Services; Winter Park, FL
Folsom Lake Primary Care; Folsom, CA
Fort HealthCare, Inc; Fort Atkinson, WI
Franciscan Missionaries of our Lady Health System; Baton Rouge, LA
Fred Tehrani MD LLC; Philadelphia, PA
Freedom Healthcare Alliance; Charleston, SC
Gammons Medical; Warren, MI
Geisinger Medical Group; Danville, PA
Geisinger; Wilkes Barre, PA
Generations Family Practice, P.A.; Cary, NC
Genesis Health System; Davenport, IA, IL
Gettysburg Family Practice Inc; Pennsylvania
Gill Medical and Geriatrics Associates; Scottsburg, IN

Glatt Medical Limited Partnership; Burlingame, CA
Glendive Medical Center, Inc.; Glendive, MT
Grand View Health; Sellersville, PA
Granger Medical Clinic, PC; Salt Lake City, UT
Greater Louisville Internal Medicine; Louisville, KY
Greater Louisville Internal Medicine; Prospect, KY
Green and Seidner Family Practice Associates; Landsdale, PA
Greenhaven Family Practice; Sacramento, CA
Greentree Primary Care; Clarksville, IN
GS Peter Gross DO PC; Philadelphia, PA
Guam Seventh-day Adventist Clinic; Tamuning, Guam
Hancock Health; Greenfield, IN
Hanover Family Practices Associates LLC; Pennsylvania
Hazel Park Medical Center; Hazel Park, MI
Health Choice
Health Choice Community Partners
Health Partners for the Elderly; Parkway Lutz, FL
Healthcare Partners of the North Country ACO, Watertown, NY
HealthChoice LLC; Memphis, TN
Heart of Texas Community Health Center, Inc dba Waco Family Medicine, Waco, TX
Hematology Oncology Consultants; Troy, MI
Hendricks Regional Health, Danville, IN
Henry Ford Physicians Accountable Care Organization dba Mosaic ACO; Detroit, MI
Holy Redeemer Family Medicine; Bensalem, PA
Hospital Physicians Network; Farmington Hills, MI
Houston Methodist Coordinated Care; Houston, TX
Howard County Medical Center; St. Paul, NE
IHC Quality Partners; Canton, OH
Imperial Center Family Medicine and Immediate Care; Durham, NC
Independent Physicians of Wisconsin/Medpoint; Milwaukee, WI
Indian Valley Family Practice; Souderton, PA
Indiana Lakes Accountable Care Organization; Goshen, IN
Innovation Care Partners; Scottsdale, AZ
Innovative Healthcare Collaborative of Indiana; Evansville, IN
Inspira Health; South New Jersey
Integra Community Care Network; Providence, RI
Internal Medicine & Cardiology Associates; Florida
Internal Medicine MD, LLC; Florida
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
inVio Health Network, Greenville, SC
Iowa Primary Care Association; Des Moines, IA
Jacksonville Children's and Multispecialty Clinic, PA; Jacksonville, NC
Jacobs And Van Cleeff Internal Medicine, PC; Cary, NC
Jericho Reach, Central VA

John C. Chow, M.D.; San Mateo, CA
John R Medical Center; Madison Heights, MI
John T. Littell M.D. PA; Florida
Johnson Memorial Health, Franklin, IN
Jose I Sosa, M.D.; Pearsall, TX
Joseph A Marotta, M.D. PA; San Antonio, TX
Juan P. Suarez, MD; Florida
Kemper And Kemper, MDs; Louisville, KY
Kenan & Wang, LLC; Sacramento, CA
Kendall Wong, M.D.; Odessa, TX
Kernersville Primary Care; Kernersville, NC
Kevin Stephens M.D. PA; Austin, TX
Keystone Accountable Care Organization; Danville, PA
Keystone Rural Health Center; Pennsylvania
Kim kuhar DO internal medicine, PC; Silverdale, PA
Kingswood Internal Medicine; Bloomfield Hills, MI
Kolender Medical; Bingham Farms, MI
Krzysztof W. Warszawski, M.D.; Garden City, MI
Kurtis Fox, M.D.; Colfax, CA
Lagrange Family Care Doctors; La Grange, KY
Lake Howell Health Center (Hoffman); Florida
Lakes Internal Medicine; West Bloomfield, MI
Lakowsky and Batlin Medical Corp.; Burlingame, CA
Lancaster General Health Community Care Collaborative, Lancaster, PA
Langdon Prairie Health, Langdon, ND
Langdon Prairie Health; Langdon, ND
Lebanon Internal Medicine Associates, P.C.; Pennsylvania
Lebanon Valley Family Medicine Inc; Pennsylvania
Lee Health; Fort Meyers, FL
Legacy Community Health Services, Inc.; Houston, TX
Legends Medical Clinic PLLC; Round Rock, TX
Leo Toupin, M.D. PA; Austin, TX
Lewerenz Medical Center & Longevity Health Institute; Rochester Hills, MI
LHS Health Network; Camden, NJ
Lifepoint Health; Brentwood, TN
Lifetime Family Care; Madison Heights, MI
Lily Enayati, M.D.; San Mateo, CA
Lincoln Medical Associates; Lincoln, CA
LMG Family Practice; Landsdale PA
Logan Health; Flathead County, MT
Lost Rivers Medical Center; Arco, ID
Loyola Physician Partners; Maywood, IL
LTC ACO; Pennsylvania
Luminis Health, Annapolis, MD
Lycoming Internal Medicine, Jersey Shore, PA
Main Line Health; Bryn Mawr, PA
MaineHealth, Portland, ME

Maria's Healthcare Service; Shelby, MT
Marshall Health Network; Huntington, WV
Martin Podiatry PC; Pennsylvania
Mass General Brigham; Boston, MA
McAuley Health Partners ACO, LLC; Ann Arbor, MI
McDermott-Sitzman Association; Washington, DC
McDonough District Hospital; McDonough County, IL
McKenzie Health System; Sandusky, MI
McKenzie Health; Watford City, ND
MD Valuecare, LLC; Richmond, VA
Medical Associates of NWA, P.A.; Fayetteville, AR
Medical Associates of Southern KY; Glasgow, KY
Medical Office of Tara L Cuda, DO, Philadelphia, PA
Memorial Community Health Inc.; Aurora, NE
Memorial Community Hospital and Health System; Blair, NE
MercyOne Population Health Services Organization, Iowa
MercyOne, Des Moines, Iowa
Meritas Health, Kansas City, MO
Methodist Alliance for Patients and Physicians, Dallas, TX
Methodist Patient Centered ACO; Dallas, TX
Methodist Physicians Clinic; Omaha, NE
MHP Palliative Care; Farmington Hills, MI
Michael Fox, D.O., DABAM; Livonia, MI
Michigan Premier Internists; Southfield, MI
Mid-Atlantic Collaborative Care, LLC
Middletown Medical; Middletown, NY
Millennium Affiliated Physicians; Farmington Hills, MI
Millennium Physician Group; Florida
Mission Health Partners; Asheville, NC
Mobile Physician Associates; Los Angeles, CA
Mohammad N. Alocozy, M.D.; Sacramento, CA
Mon Health System; Morgantown, WV
Monticello Medical Associates - Monticello, KY
Monument Health; South Dakota
Morris Hospital and Healthcare Centers; Morris, IL
Mount Carmel Health Partners; Columbus, OH
Mount Sinai Health System; New York, NY
Mount Sinai Morningside, Mount Sinai Health System, New York, NY
Mountain View Hospital; Idaho Falls, ID
MultiCare Connected Care; Tacoma, WA
MUSC Health Alliance; Charleston, SC
Myrtue Medical Center; Harlan, IA
Nathan J, Hershberger, PLLC; Florida
Nebraska Health Network; Omaha, NE
Nebraska Medicine; Omaha, NE
Neil A. Patterson, M.D., P.A.; Florida
New Britain Family Practice, New Britain, PA

New Era Healthcare Henrico, VA
New Liberty Hospital Corporation; Liberty, MO
New Providence Internal Medicine Associates/Primary Care Partners; Providence, NJ
Next ACO, LLC; Trinity, FL
NOMS Healthcare, LLC; Sandusky, OH
NorCal Endocrinology & Internal Medicine; Roseville, CA
Nor-Lea Hospital District; Lovington, NM
North Austin Family Medicine, PA; Austin, TX
North Carolina Internal Medicine, PC; Cary, NC
North Raleigh Medical Center; Raleigh, NC
North Star Family Medicine P.A.; Round Rock, TX
Northern Light Health; Brewer, ME
Northern Medical Group; Poughkeepsie, NY
Northfield Hospital + Clinics; Northfield, MN
NW Momentum Health Partners ACO; Olympia, WA
Oakland Family Practice; Madison Heights, MI
Ochsner Health; New Orleans, LA; MS; TX
Odessa Consultants, PLLC; Odessa, TX
Odessa Memorial Healthcare Center; Odessa, WA
Office of Dr. Meyers; Bloomfield Hills, MI
Office of Imad George M.D.; Livonia, MI
Office of Langnas and Stashefsky; Madison Heights, MI
Office of Mary Ferris M.D.; Warren, MI
Ogden Clinic, PC; Ogden, UT
Olmsted Medical Center; Rochester, MN
On Point Medical Group; Denver, CO
OneCare Vermont ACO; Colchester, VT
OneHealth Nebraska; Lincoln, NE
Optimus Healthcare Partners ACO; Summit, NJ
Optum; Eden Prairie, MN
Orlando Health; Florida
Orlando Primary Care, PA LLC; Florida
Osceola Women & Family Medicine Specialists; Florida
Pankaj J Patel, M.D., P.A.; Midland, TX
Parkside Family Medicine; Philadelphia, PA
Patient Quality Alliance; Pocatello, ID
Paul E. Bristol, M.D.; Austin, TX
Paul M. Izes, D.O.; Southampton, PA
Paul R. Ehrmann, D.O.; Troy, MI
Pentahealth Primary Care; Downingtown, PA
Pentahealth; West Chester, PA
Peter R. Honig, D.O.P.C.; Philadelphia, PA
Physician Organization of Michigan ACO; Ann Arbor, MI
Physician Performance LLC; Woburn, MA
Physicians Primary Care of SW FL; Fort Myers, FL
Piedmont Adult and Pediatric Medicine Associates; Gastonia, NC
Pinellas County Primary Care & Hospitalists, PLLC; Florida

Pinnacle Physicians Group; Feasterville-Trevose, PA
Port Lavaca Clinic Associates, P.A.; Port Lavaca, TX
Pottstown Medical Specialists, Inc.; Pottstown, PA
Preferred Medical Group; Madison Heights, MI
Premier Ankle & Foot Specialists PC; Pennsylvania
Premier Internists; Farmington Hills, MI
Primary Care Centers of Eastern Kentucky; Hazard, KY
Primary Care Development Corporation; New York, NY
Primary Care Specialists of Orlando - Orange Avenue; Florida
Primary Partners ACO; Florida
Primary Partners Alliance; Clermont, FL
Primary Partners; Clermont, FL
Privia Health; Arlington, VA
Privia Medical Group, North Texas
Progressive Health Care, P.C.; Taylor, MI
Prospect Medical Holdings; Los Angeles, CA
PSW, Washington State
Pullman Regional Hospital; Pullman, WA
Purisima Family Medicine; Half Moon Bay, CA
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
Rancho Health Management; Riverside, CA
Redford Clinic; Redford, MI
Reed Relations Consulting, LLC; Catawissa, PA
Reid Health; Eastern IN & Western, OH
Revere Health, Provo, UT
Richmond Quality ACO; Staten Island, NY
Rittenhouse Internal Medicine, Philadelphia, PA
Ritu Suri MD LLC; Englewood NJ
Riverwood Healthcare Center; Atikin, MN
RMG Gastroenterology; Raleigh, NC
Rochester Medical Group; Rochester Hills, MI
Rocklin Family Practice & Sports Medicine; Rocklin, CA
Rocky Mount Family Medical Center, P.A.; Rocky Mount, NC
RSI Medical; Wendell, NC
Rush Health, Chicago, IL
Ryan Medical Associates, P.C.; Warren, MI
Saint Francis Health System, Tulsa, OK
Samaritan Healthcare; Moses Lake, WA
Sammy Lerma III, M.D., PA; Bastrop, TX
Sanjay Pethkar MDSC; Plainfield, IL
Sayed A. Hussain, M.D.; Roseville, CA
Schaefferstown Family Practice Inc.; Pennsylvania
Scottsdale Imaging Services, LLC; Scottsdale, AZ

Scripps Accountable Care Organization, LLC; San Diego, CA
SDI Services, LLC; Arizona
Select Health Network; Mishawaka, IN
Sellersburg Internal Medicine & Pediatrics; Sellersburg, IN
Sergio B Seoane M.D.; Florida
Shah And Associates Family Practice; Cary, NC
Shenandoah Medical Center; Shenandoah, IA
Shroff Cardiology & Internal Medicine Clinic Pa; Big Spring, TX
Shylesh Ganta, M.D., P.A.; Midland, TX
Sidney Health Center; Sidney, MT
Silver Pine Medical Group; Sterling Heights, MI
Silver State ACO; Las Vegas, NV
SMP Health - St. Kateri; Rolla, ND
SOMOS ACO; New York, NY
SoNE Health; Windsor, CT
South Macomb Internists; Warren, MI
South Texas Internal Medicine Associates; San Antonio, TX
Southeast Health Statera Network; Dothan, AL
Southeastern Health Partners; Greenville, SC
Southern Atlantic Healthcare Alliance; Cary NC
Southwest Diagnostic Imaging, LLC; Scottsdale, AZ
Southwest Healthcare Services; Bowman, ND
Southwest Internal Medicine Specialists; Florida
Southwest Medical Imaging, Ltd; Scottsdale, AZ
Space Coast ACO, LLC; New Port Richey, FL
Stephen J. Carney, M.D.; Burlingame, CA
Stephen J. Shields, MD PA; Florida
Stephen Williams Internal Medicine MD PC; Troy; MI
Sterling Physicians; Sterling Heights, MI
Stratum Med; Champaign, IL
Subodh K Mallik, M.D.; Ft. Stockton, TX
Summit Health; Berkeley Heights, NJ
Summit Healthcare Regional Medical Center; Show Low, AZ
Summit Physician Services; Pennsylvania
Suncoast Premier Medical, LLC; Florida
Sunflower Medical Group P.A.; Kansas City, KS
Suresh Prasad, M.D. PA; Odessa, TX
Sutter Health; Sacramento, CA
Tandigm Health; West Conshohocken, PA
Tandigm Value Partners; Southeastern, PA
TC2; Macon, GA
TeamHealth; Knoxville, TN
The Center for Health Affairs; Cleveland, OH
The Doctor's In, Inc.; Roseville, CA
The Iowa Clinic, Des Moines, IA
The South Bend Clinic; South Bend, IN
The Wright Center for Community Health and Graduate Medical Education; Scranton, PA

Think Whole Pearson Healthcare; Omaha, NE
Thomas Hopkins, M.D.; Roseville, CA
Thundermist Health Center, Warwick, RI
Tommy T. Kuo, M.D.;San Mateo, CA
Torrance Memorial Integrated Physicians, LLC; Torrance, CA
Total Family Healthcare; Florida
Traci Thompson, MD PA; Florida
Triad HealthCare Network; Greensboro, NC
Triad Internal Medicine; Asheboro, NC
Triad Primary Care, PLLC; Greensboro, NC
Trinsic; Denver, CO
TriState Health; Clarkston, WA
Tryon ACO, LLC; Charlotte, NC
Twin Lakes Family Medicine; Bloomfield Hills, MI
UC San Diego Health; San Diego, CA
UMass Memorial Health; Worcester, MA
UNC Senior Alliance/UNC Health; Chapel Hill, NC
United Hospital District; Blue Earth MN
UnityPoint Accountable Care; Des Moines, IA
University Internal Medicine, Inc; Pawtucket, RI
Vanderbilt University Medical Center; Nashville, TN
Versailles Family Medicine; Versailles, KY
Vikram Vadyala, M.D.; Midland, TX
Virginia Care Partners; Richmond, VA
Vista Complete Care; Auburn, CA
Vital Medicine PC; Livonia, MI
Vraj Medical LLC; Florida
Vytalize Health; Hoboken, NJ
Wake Internal Medicine & Pediatrics; Raleigh, NC
Wake Internal Medicine Consultants, Inc.; Raleigh, NC
Wakely, an HMA Company (Nationwide)
WellSpan ACO; York, PA
WellSpan Medical Group; Pennsylvania
Wellvana Health; Nashville, TN
Wesley R. Barnes, M.D.; Royal Oak, MI
West Florida ACO, LLC; Tampa Bay, FL
Western Wake Wellness; Cary, NC
Westland Clinic; Westland, MI
Westland Healthcare; Westland, MI
WinnMed; Decorah, IA
Winona Health; Winona, MN
Winter Garden Health and Wellness; Florida
Winter Park Family Practice; Florida
Wrightstown Family Medicine; Newtown, PA
Xin-Nong Li M.D., Inc.; Fair Oaks, CA
Yorktowne Urology PC; Pennsylvania
You and Your Health Family Care; Florida

Zia ACO, LLC; Taos, NM