

February 23, 2022

The Honorable Xavier Becerra  
Secretary  
Department of Health and Human Services  
200 Independence Ave SW  
Washington, D.C. 20201

The Honorable Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare & Medicaid Services  
7500 Security Blvd  
Baltimore, MD 21244

Dear Secretary Becerra and Administrator Brooks-LaSure,

We are writing to express our support for the Global and Professional Direct Contracting models, currently being tested by the Centers for Medicare & Medicaid Services (CMS) Innovation Center. We have all worked in Democratic Administrations and have been directly involved in the implementation of President Obama's health and payment reform policies. We urge you to continue these models, which build on the success of over a decade of Medicare accountable care policy.

The Direct Contracting Global and Professional risk models build on provisions of the Affordable Care Act, including the Medicare Shared Savings Program (MSSP) and the Innovation Center model portfolio, such as the Pioneer and Next Generation Accountable Care Organization (ACO) models. Global and Professional Direct Contracting are testing new concepts that, if successful, could chart a path to help MSSP ACOs provide better care at lower cost to millions of Medicare beneficiaries. Importantly, these models, like other models, adhere to the promise that beneficiaries remain free to see any Medicare provider, are not subject to prior authorization or other utilization management controls, and retain the same rights as all beneficiaries in traditional Medicare. While Global and Professional Direct Contracting have been characterized as Trump Administration models, the fact is that they build on ACO models spanning four Administrations and across an array of political viewpoints.

Over the past decade, MSSP and other ACO models have encouraged care coordination, reduced waste, and improved outcomes for Medicare patients. The ACO models, including Direct Contracting, address the fragmentation and duplication of services that so many of us have witnessed and that are well-documented in fee-for-service (FFS) systems. Using waivers available from the Innovation Center, Direct Contracting Entities (DCEs) and ACOs can address the social determinants of health by providing additional benefits and services beyond those available in traditional FFS Medicare. Finally, the changes to cash flow—away from per-click FFS payments and toward a population-based payment approach—will enable providers to invest in their communities, expanding access to underserved populations and implementing innovative approaches to address health equity.

Beyond the merits of these specific models, we are committed to letting the Innovation Center do its work. The Innovation Center was created to test models and approaches that improve quality and lower costs. It works with partners across the healthcare ecosystem that invest in care delivery and management. If models do not achieve those core goals, they should be modified or terminated with proper notice—as we would expect of any reliable partner. Additional modifications to these models might be necessary, and we support the Innovation Center in doing its analysis to determine what changes will result in improved outcomes and advancements in health equity for underserved beneficiaries.

In conclusion, we support continued testing of the Global and Professional Direct Contracting models. For the future of ACO policy, we think it is critically important to continue these models, with improvements, and to offer an additional opportunity for organizations to participate in 2023. Furthermore, these models are an important component of reaching CMS' goal of having 100 percent of Medicare beneficiaries in an accountable care relationship by 2030—a goal that we all share and support. We also think that continuation of Global and Professional Direct Contracting is vital to the future of the Innovation Center's value based care agenda, one of the crowning achievements of the Affordable Care Act that we all worked so hard to pass, implement, and protect.

Sincerely,

Niall Brennan  
Sean Cavanaugh  
Patrick Conway  
Natalie Davis  
Chris Dawe  
Karen DeSalvo  
Ezekiel Emanuel  
Adaeze Enekwechi  
Tim Gronniger  
Julian Harris  
Bob Kocher  
Farzad Mostashari  
Kathleen Sebelius  
Andy Slavitt