



August 24, 2016

Patrick Conway, MD  
Deputy Administrator for Innovation & Quality and Chief Medical Officer  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard  
Baltimore, Maryland 21244-1850

Dear Dr. Conway:

We are writing to request that Center for Medicare and Medicaid Innovation (CMMI) make available as soon as possible the Center's CPC+ "methodology paper" explaining how CMMI will calculate prepaid amounts and repayment amounts under the CPC+ demonstration. CMMI noted the methodology paper on page 6 of its August 1, "Practice Frequently Asked Questions" document but does not state when the paper will be available. We contacted the CPC+ Help Desk two weeks ago and were told that they are unaware of both the paper and its publication date.

Obviously, it is difficult, if not impossible, for provider practices to decide responsibly whether or not they can or should participate in the CPC+ demonstration as either a Track 1 or Track 2 when they do not know to what extent they will be at risk for repaying all or a portion of their prepaid amounts to CMS.

This situation is particularly frustrating for a few AMGA members since it is ostensibly a repeat of their NGACO experience. These AMGA members did not receive their NGACO financial benchmark and historical spending data until mid-December 2015. This left them with just two weeks to perform a somewhat sophisticated analysis of the data. For one AMGA member, they withdrew their MSSP ACO renewal application in the fall of 2015 anticipating they would be an Next Generation Accountable Care Organization participant in 2016. However, because of the time constraint, i.e., the two weeks they had to decided NGACO participation, they felt forced to defer participation until 2017. This, in turn, caused them to lose a year of ACO experience.

We urge CMMI leadership to make the methodology paper available as soon as possible particularly since providers as of today have three weeks to submit their CPC+ application.

If you have any questions please do not hesitate to contact David Introcaso, Ph.D., Senior Director for Regulatory and Public Policy, at [dintrocaso@amga.org](mailto:dintrocaso@amga.org).

Sincerely,

Donald W. Fisher  
President and CEO

cc: Amy Bassano, Deputy Director; Arrah Tabe-Bedward, Acting Deputy Director