



March 27, 2020

Seema Verma
Administrator
Centers for Medicare and Medicaid Services
Hubert H. Humphrey Building
200 Independence Avenue, SW, Room 445-G
Washington, DC 20201

Re: Medicare Shared Savings Program Response to COVID-19

Dear Administrator Verma,

Thank you for your leadership through the unprecedented and difficult circumstances of the COVID-19 pandemic. As our nation's health system faces this enormous challenge, Caravan Health remains committed to improving the health of our seniors and believes that, with your help, the Medicare Shared Savings Program can come out of this crisis strong and ready for the future.

MSSP, and particularly the new Pathways to Success model, has proven to improve the quality of care for Medicare beneficiaries while reducing the trend of trust fund expenditures. The ACOs remain dedicated to excellence through the COVID-19 pandemic. ACOs are shifting resources to support physician practices and hospitals as they manage COVID-19 patients and prepare for more cases among our nation's seniors. ACOs should be assured that the program rules will fairly account for these extraordinary circumstances.

To sustain the momentum and strong results of the program, we urge CMS to freeze all MSSP Pathways contracts at their current risk level through 2021 and give new Pathways ACOs the option of starting in July 2021, rather than January.

Experience of Caravan Health

Caravan Health currently supports 600,000 attributed Medicare beneficiaries in the MSSP, with 200,000 enrolled in Pathways to success in 2020. We are preparing to move our 2020 Pathways cohort into Level E and the remainder of our lives into Pathways Level B in 2021. As we plan the transition to downside risk, our providers are understandably concerned about the unpredictable impact of COVID-19 on benchmarks and expenditures.

For example, the delay of elective surgeries ordered by CMS could artificially depress expenditures in 2020 and inflate expenditures in 2021, which could result in devastating spurious ACO losses for providers who begin the program in 2021. Alternatively, COVID-19 may increase hospitalizations dramatically for our seniors. With so many unknowns, we fear that



many providers could choose to leave the program rather than advance into downside risk during this unusual time, losing the momentum of the Pathways program which may take years to rebuild.

As ACO participants are struggling with preparing for and coping with the virus, there is little or no capacity to consider new programs and new contracts. The main operating principle is to maintain the status quo wherever possible to get through this period of unusual stress. We urge CMS to keep ACOs at their current level in Pathways for an additional year and allow new ACOs the option to join Pathways in July 2021. Most organizations would continue to provide high-quality care in a cost-effective manner with these program adjustments.

ACOs should not be unfairly penalized for circumstances beyond their control. Making these program changes will retain participation in the program and position our health care system to continue this important work when the COVID-19 crisis is behind us.

Sincerely,

Lynn Barr
Founder and Executive Chair, Caravan Health