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 23 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.

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

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

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, 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
Essentia Health; Duluth, MN; WI; ND
Evolent 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
On Delay 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
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Accountable Care Coalition of Southeast Wisconsin, LLC
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AdvantagePoint Health Alliance, LLC - Bluegrass
AdvantagePoint Health Alliance, LLC - Hot Springs
AdvantagePoint Health Alliance, LLC - Laurel Highlands
AdvantagePoint Health Alliance, LLC - Northwest
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agilon health, Texas
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Aledade Accountable Care 143, LLC
Aledade Accountable Care 147, LLC
Aledade Accountable Care 149, LLC
Aledade Accountable Care 15, LLC
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Aledade Kansas ACO, LLC
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AtlantiCare; Atlantic City, NJ
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Azelvandre Family Practice; Florida
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Baptist Health South Florida; Miami, FL
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Be Well Medical Center; Berkley, MI
Beartooth Billings Clinic; Red Lodge, MT
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Capital Family Medicine; Raleigh, NC
Capital Family Physicians, P.A.; Raleigh, NC
Capitol Internal Medicine Associates; Carmichael, CA
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Cardiology and Vascular Associates, P.C; Bloomfield Hills, MI
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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
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CHI Health Partners; Omaha, NE
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City Healthcare; Florida
Civitas Networks for Health; National
Clark Fork Valley Hospital; Plains, MT
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Clarkston Medical Group; Clarkston, MI
Clarkston Medical Group; Oxford, MI
Clermont Medical Center; Florida
Cleveland Clinic; Cleveland, OH, FL, NV
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Community Memorial Hospital; Hamilton, NY
Complete Care Family Medicine Associates; Florida
Cone Health, Greensboro, NC
ConnectAmerica; Bala Cynwyd, PA
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Dana Kerner LLC; Southampton, PA
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DHR Health; Edinburg, TX
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Doylestown Value Partners; Doylestown, PA
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Drs. Elias & Oakley, MD PA; Florida
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Duly Health and Care; Wheaton, IL
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Family First Primary Care, PLLC; Wake Forest, NC
Family Health Care Center; Royal Oak, MI
Family Health West; Fruita, CO
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Family Medical Center; Florida
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Family Medicine & Ambulatory Care Center; Fair Oaks, CA
Family Medicine Clinic, PC
Family Medicine Clinic; Pearsall, TX
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Greater Louisville Internal Medicine; Prospect, KY
Green and Seidner Family Practice Associates; Lansdale, PA
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Hancock Health; Greenfield, IN
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Health Choice Community Partners
Health Partners for the Elderly; Parkway Lutz, FL
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Hospital Physicians Network; Farmington Hills, MI
Houston Methodist Coordinated Care; Houston, TX
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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
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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
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Kernersville Primary Care; Kernersville, NC
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Keystone Rural Health Center; Pennsylvania
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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
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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
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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
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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
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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
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Premier Internists; Farmington Hills, MI
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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
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PSW, Washington State
Pullman Regional Hospital; Pullman, WA
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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
Samy 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