

# CMS Proposed Rule Expands Opportunity for Physician-Led MSSP ACOs

On August 9, 2018, the Centers for Medicare & Medicaid Services (CMS) issued a proposed rule containing a number of important changes designed to strengthen and stabilize the Medicare Shared Savings Program (MSSP). These changes, called “Pathways to Success,” make the MSSP program more attractive than ever for physician-led Accountable Care Organizations (ACOs).

Aledade outlines three categories of risk as it relates to the ACO journey:

Medical Risk	Insurance Risk	Regulatory Risk
Changes in cost driven by the delivery of healthcare services (e.g. how well diabetic patients are managed)	Changes in cost that are not driven by the delivery of healthcare services (e.g. changes in the prevalence of diabetes in a population).	Changes in regulations and/or rules that present headwinds.

The proposed rule improves risk across these categories, and makes it more appealing for independent practices, Federally Qualified Health Centers (FQHCs) and Rural Health Clinics (RHCs) to access and succeed in the MSSP. Aledade advocated for many of these policy changes, including:

- **Improved benchmarking methodology** that properly accounts for regional variations in costs
- **A new risk score methodology** that more accurately reflects the cost profile of beneficiaries attributed to ACOs
- **New participation tracks** that make it possible to pursue more savings opportunities sooner, based on an ACO’s experience with risk
- **Downside risk protection** that limits any losses to a defined percentage of Medicare revenue
- **Greater participation flexibility** that allows ACOs to select from two beneficiary attribution methodologies, move freely between participation tracks, and select their preferred level of revenue risk

Once the rule is finalized, independent practices, FQHCs and RHCs can look forward to a more stable and even playing field for MSSP ACOs.

The additional flexibilities afforded by the proposed rule represent exciting new opportunities for physician-led ACOs, making it even more important for them to work with a partner capable of properly assessing their options and supporting them throughout their value-based care.

Aledade remains committed to advancing incremental policy changes that will support physician independence, physician-led ACOs, and the ACO market as a whole during the comment period that runs through October 16, 2018.



Learn more at [www.aledade.com](http://www.aledade.com)

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**About Aledade:** Since 2014, Aledade has partnered with independent practices, FQHCs and RHCs to sustain their viability through success in new payment models. We currently work with a growing community of independent physicians across nearly 300 sites in 18 states, and focus on quality improvement and cost savings. We complement our partner practices’ capabilities with a comprehensive range of services, technology and expertise, and align our financial interests with theirs through shared savings.