



July 19, 2022

Dr. Mark McClellan, Co-chair, CEO Forum
Dr. Marc Harrison, Co-chair, CEO Forum
Dr. Judy Zerzan-Thul, Co-chair, Care Transformation Forum
Dr. William Shrank, Co-chair, Care Transformation Forum
Health Care Payment Learning & Action Network
Submitted electronically at <https://hcp-lan.org/public-feedback/>

RE: Accountable care definition request for public feedback

Dear Drs. McClellan, Harrison, Zerzan-Thul, and Shrank:

The National Association of ACOs (NAACOS) appreciates the opportunity to submit comments to the Health Care Payment Learning & Action Network (LAN) on the new definition of accountable care, released at the 2022 LAN Spring Event. NAACOS represents more than 400 accountable care organizations (ACOs) participating in a variety of value-based payment and delivery models in Medicare, Medicaid, and commercial insurers. Serving more than 13 million beneficiaries, our ACOs participate in models such as the Medicare Shared Savings Program (MSSP), the Global and Professional Direct Contracting Model (GPDC), and other alternative payment models (APMs). NAACOS is a member-led and member-owned nonprofit organization that works to improve quality of care, health outcomes, and healthcare cost efficiency.

We support the LAN's mission to accelerate the shift to value-based care in order to achieve better health outcomes at lower costs and we believe [ACOs are the best avenue](#) to realizing these goals. The lack of a shared understanding of ACOs and the goals of accountable care has led to misinformation and calls to abandon the pathway to value. ACOs and value-based care can be complex, so it is important that this information be communicated in a way that resonates with beneficiaries and other stakeholders. The Centers for Medicare and Medicaid Services (CMS) has been working to increase [beneficiary education](#) on accountable care as a way to support the agency's [strategic objective](#) to have all fee-for-service (FFS) Medicare beneficiaries in a care relationship with accountability for quality and total cost of care by 2030. Multistakeholder alignment is needed to strengthen and grow accountable care models and move our health system away from a FFS payment model. As a diverse group of public and private health care leaders, the LAN is well suited to build multistakeholder consensus.

NAACOS is concerned that the new LAN definition of accountable care is a step in the wrong direction because it deviates considerably from [existing definitions](#). The definition includes industry jargon and buzzwords that are not likely to effectively communicate the concept of accountable care to patients and providers on the front line. This will likely cause confusion about the importance of accountable care during a time in which many groups are [working to](#)

[combat](#) the significant misinformation being spread about ACOs and value-based care. Specifically, we have heard from CMS¹ that the term “high-value” does not resonate with beneficiaries and is often associated with managed care plans or care stinting. Similarly, the phrase “longitudinal, person-centered care” is theoretical and likely doesn’t convey the intended meaning with those outside health policy circles. The definition also does not mention health care providers, who comprise and lead ACOs.

We think it would be more beneficial to have a standard definition that is applicable to broad audiences and centers around the core goal of accountable care, the collaboration between health care providers to improve patient outcomes. We recommend the following definition:

Accountable care: When a group of doctors, hospitals, and other health care providers contract with health plans and other payers to assume responsibility for the costs, quality, and outcomes of a defined group of patients and collaboratively work to improve quality of care, care coordination, and patient outcomes, reducing fragmented care and unnecessary costs.

This definition more closely resembles definitions currently used by ACOs, CMS, and other prominent accountable care stakeholders. More importantly, it keeps the focus on patient care and the providers delivering it.

Thank you for your engagement on these important issues and for your consideration of our feedback. NAACOS looks forward to continuing to engage with the LAN and other stakeholders to improve and expand accountable care models that deliver better outcomes, reduce health inequities, and reduce costs for our health care system.

Sincerely,



Clif Gaus, Sc.D.
President and CEO
NAACOS

¹ Elizabeth Fowler, CMS Deputy Administrator and Director of the Center for Medicare and Medicaid Innovation. NAACOS 2022 spring conference plenary. Baltimore, MD. April 29, 2022.