



MSSP Proposed Rule Comments Are Due October 16th

Rocky Mountain and San Juan ACOs collectively saved over \$6M in 2017, with an average quality score of 95 points! That's over \$226 per patient. You are providing better patient care by delivering high quality outcomes and integrating population health strategies for improving overall health. Your efforts are moving the needle and producing results. It would be devastating to stop this momentum. Don't allow the [CMS Proposed Rule](#) to become our reality.

The proposed rule consists of two 5-year tracks, BASIC and ENHANCED [discussed further in this month's Capitol Comments]. CMS proposes reducing the number of upside-only years for new ACOs from six (two current 3-year Track 1 agreement periods) to two. The shared savings opportunity is proposed to move from the current 50 percent to 25 percent. These highlight two major issues/concerns for rural participants to enter a MSSP ACO or to continue with the program. **Rural ACOs should not have to take risk and we need your voice.**

Please take a few minutes to voice your concerns about MSSP Proposed Rule for 2019 to CMS, your senators and congressmen by **October 16th**.

1. Let them know that your rural ACO is a high-quality performer and is saving CMS money.
2. Let them know that your rural practice or facility lacks capital reserves and cannot take on risk.
3. Let them know that a 25% shared savings opportunity is not worth the effort.
4. Let them know that rural ACOs who meet ACO Investment Model (AIM) eligibility criteria should be considered "low revenue".

To submit a comment to CMS on this regulation, visit <https://www.regulations.gov>, and enter the file code **CMS-1701-P** in the search bar.

Reach out to your [senators](#) and [congressmen](#) and share your opinions and recommendations on the proposed rule today!