



**CALIFORNIA  
HOSPITAL  
ASSOCIATION**

*Providing Leadership in  
Health Policy and Advocacy*

June 29, 2018

Adam Boehler  
Director  
Center for Medicare & Medicaid Innovation  
Centers for Medicare & Medicaid Services  
7500 Security Blvd  
Baltimore, MD 21244

***SUBJECT: Bundled Payments for Care Improvement Advanced***

Dear Mr. Boehler:

The California Hospital Association (CHA), on behalf of our more than 400 member hospitals and health systems and our clinician partners, is writing to request additional start dates in 2019 for the Bundled Payments for Care Improvement (BPCI) Advanced model. CHA continues to support the development and use of alternative payment and delivery models to reward better, more efficient, coordinated and seamless patient care. As California hospitals continue to look for opportunities to better align their value and quality improvement efforts with those of affiliated clinicians, it is especially important to have options, such as BPCI Advanced, that incentivize clinicians to participate under the advanced alternative payment model bonus payments allowed by the Medicare Access and CHIP Reauthorization Act of 2015.

However, we echo the concerns recently articulated by the American Hospital Association. **To make informed decisions about participation in BPCI Advanced, and to succeed in the model if they do participate, applicants need both a complete suite of data from CMS — including episode target prices and summary and raw claims data — and sufficient time to analyze those data.** While CMS initially indicated it would provide this data to applicants by the end of May, many did not receive their data until well into June; others still have yet to receive it. The current timeline requires hospitals to select clinical episodes for which they will be held accountable and return their signed participant agreements by August 1, 2018, giving many hospitals fewer than two months to conduct the complete and complex analyses that are required to decide whether to participate in the model.

This truncated timeline makes it nearly impossible to make an informed decision about participation in BPCI Advanced, and may lead hospitals to forgo participation altogether. **To maximize the number of applicants that elect to participate in BPCI Advanced, we urge CMS to offer two additional, optional Performance Year 1 start dates of January 1, 2019, and April 1, 2019.** These additional start dates would expand the opportunities for applicants to be part of the initial BPCI Advanced cohorts, enabling CMS to pilot the program with a greater number of well-informed participants. Further, by making these start dates optional, CMS can still allow prepared applicants to begin by the original program start date of October 1, 2018.

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We thank the agency for continuing its commitment to expanding alternative payment model options for hospitals and clinicians, and appreciate your consideration of our comments. If you have any questions, please contact me at [akeefe@calhospital.org](mailto:akeefe@calhospital.org) or (202) 488-4688.

Sincerely,

/s/

Alyssa Keefe

Vice President, Federal Regulatory Affairs

CC: Amy Bassano, Deputy Director  
Arrah Tabe-Bedward, Deputy Director  
Christina Ritter, Director, Patient Care Models Group