ACO Participation Increases in 2024

On January 29, 2024, the Centers for Medicare and Medicaid Services (CMS) announced that Performance Year 2024 participation increased in their various accountable care organization (ACO) initiatives. Specifically, 50 new ACOs joined the Medicare Shared Savings Program (MSSP), and 71 ACOs renewed their contracts, bringing the total participation in the MSSP to 480 ACOs. Additionally, 245 organizations chose to continue participation in two other CMS models – the ACO Realizing Equity, Access, and Community Health (REACH) Model and the Kidney Care Choice (KCC) Model. This Health Capital Topics article reviews the CMS report and implications for CMS's ACO initiatives.

In general, the ACO model holds groups of healthcare providers responsible for the quality and cost of healthcare delivery provided to an ACO's patient population.4 ACOs are controlled by the provider members who work together to control costs, improve quality, and coordinate care. Those ACOs that achieve payor-designated spending and quality targets receive a share of the cost savings.5 Most ACOs adhere to one of three primary structures: (1) hospital-led; (2) physicianled; and (3) jointly-led.⁶ ACOs vary significantly in the services delivered to patients, the types of providers included in an ACO group, and their range of capabilities, which may include care management, advanced analytics, and shared interdisciplinary decision making.⁷ In general, ACOs are associated with improved patient satisfaction and other patient-reported measures,8 many of which improvements are concentrated in highneed, high-cost populations.9 However, there is significant variance in ACO performance, with some ACOs achieving savings and others spending far more after formation.¹⁰

Most ACOs participate in the federal accountable care models offered by CMS. ¹¹ MSSP ACOs are comprised of hospitals, physicians, and other healthcare providers that collaborate to provide coordinated, high quality care to Medicare beneficiaries, while focusing on delivering the appropriate care at the correct time and avoiding unnecessary medical errors and services. ¹² When an ACO succeeds in delivering high quality care and spending healthcare dollars wisely, the ACO could be eligible to share in the savings it achieves for Medicare. ¹³ A 2020 study of 513 ACOs participating in the MSSP showed that 67% of participating ACOs generated a positive shared savings of \$2.3 billion. ¹⁴ Between 2016

and 2020, the percentage of ACOs with positive shared savings grew 21% annually.¹⁵ Of the 482 ACOs in 2022, 84% achieved savings for Medicare, with 63% of ACOs earning shared savings.¹⁶

The ACO REACH Model provides resources and tools for healthcare providers to work together in an ACO to improve the quality of care for Medicare beneficiaries. ¹⁷ REACH ACOs are comprised of both primary and specialty care physicians. ¹⁸ To advance health equity, the model requires all participating ACOs to establish a plan describing how they will meet the needs of Medicare beneficiaries in underserved communities, and how they will make changes to address health disparities. ¹⁹

In the KCC Model, dialysis facilities, nephrologists, and other healthcare providers form ACOs focused on managing care for Medicare beneficiaries with end-stage renal disease (ESRD) or chronic kidney disease (CKD) stages 4 and 5.²⁰ The model includes strong financial incentives for providers to manage this care, with the goal of delaying the onset of dialysis and incentivizing kidney transplants.²¹

As noted above, CMS announced that the MSSP currently has 480 participating ACOs comprising 634,657 providers and organizations with the ability to provide care to over 10.8 million traditional Medicare beneficiaries.²² The agency also noted that participating ACOs are expected to deliver care to traditional Medicare beneficiaries in 9,032 federally qualified health centers (FQHCs), rural health clinics (RHCs), and critical access hospitals (CAHs), representing a 27% increase in participants from 2023.23 For 2024, the ACO REACH Model has 122 ACOs with 173,004 healthcare organizations and providers furnishing care to an estimated million traditional 2.6 Medicare beneficiaries.²⁴ This model includes 1,042 FOHCs, RHCs, and CAHs, representing more than a 25% increase in participants from 2023.25 The KCC Model is comprised of more than 9,227 participating healthcare organizations and providers, representing a 10% increase in participants from 2023.26 This year, 282,335 Medicare beneficiaries suffering from ESRD and CKD are expected to be served.²⁷

These three aforementioned ACO programs are expected to increase access to high-quality care, with the ACO REACH Model targeting underserved populations (i.e., located in rural areas) and the KCC Model focusing on Medicare beneficiaries with ESRD and CKD.²⁸ CMS

expects 13.7 million Medicare beneficiaries to be aligned with an ACO, which means nearly half of all traditional Medicare beneficiaries are (or will be) assigned to an ACO in 2024.²⁹

President and CEO of the National Association of ACOs (NAACOS), Clif Gaus, stated that NAACOS "is happy to see growth in these important CMS programs, which was helped by changes put in place this year to help more provider organizations join value-based care models."³⁰ The group recommended that CMS modify the current models by revamping how benchmarks are set, altering patient engagement rules, and relaxing reporting requirements,³¹ in order to encourage and increase

participation in value-based programs (i.e., Medicare ACO programs). 32

CMS Administrator Chiquita Brooks-LaSure stated that "one of CMS' top priorities is to expand access to quality, affordable health coverage and care."³³ Brooks-LaSure also said that "accountable care initiatives – which give more tools to health care providers to deliver better care and help people receive more coordinated care – through programs like the [MSSP] and the Innovation Center accountable care initiatives are critical to achieving this vision."³⁴ The Biden-Harris Administration has set a goal of bringing all Medicare beneficiaries into value-based care models by 2030, and ACOs will be essential in reaching that goal.³⁵

- "Participation Continues to Grow in CMS' Accountable Care Organization Initiatives in 2024" Centers for Medicare and Medicaid Services, January 29, 2024, https://www.cms.gov/newsroom/press-releases/participation-continues-grow-cms-accountable-care-organization-initiatives-2024 (Accessed 2/14/24).
- 2 Ibid.
- 3 Ibid.
- 4 "Accountable Care Organizations The Risk of Failure and the Risks of Success" By Lawrence P. Casalino, The New England Journal of Medicine, Vol. 371, Issue 18, October 2014, p. 1750; "Moving Forward with Accountable Care Organizations: Some Answers, More Questions" By Carrie H. Colla, JAMA Internal Medicine, Vol. 177, No. 4, April 2017, p. 527.
- 5 "Shared Savings Program" Centers for Medicare & Medicaid Services, 2023, https://www.cms.gov/Medicare/Medicare-Feefor-Service-Payment/sharedsavingsprogram (Accessed 2/14/24).
- "A taxonomy of accountable care organizations for policy and practice" By Stephen M. Shortell, et al., Health Services Research, Vol. 49, Issue 6, December 2014, p. 1883-1895; "Assessing Differences between Early and Later Adopters of Accountable Care Organizations Using Taxonomic Analysis" By Frances M. Wu, Stephen M. Shortell, Valerie A. Lewis, Carrie H. Colla, and Elliott S. Fisher, Health Services Research, Vol. 51, Issue 6, p. 2318-2329.
- 7 "First National Survey Of ACOs Finds That Physicians Are Playing Strong Leadership And Ownership Roles" By Carrie H. Colla, Valerie A. Lewis, Stephen M. Shortell, and Elliott S. Fisher, Health Affairs, Vol. 33, No. 6, June 2014, p. 967-970.
- 8 "Changes in Patients' Experiences in Medicare Accountable Care Organizations" By J. Michael McWilliams, Bruce E. Landon, Michael E. Chernew, and Alan M. Zaslavsky, The New England Journal of Medicine, Vol. 371, Issue 18, October 2014, p. 1715.
- 9 "Association Between Medicare Accountable Care Organization Implementation and Spending Among Clinically Vulnerable Beneficiaries" By Carrie H. Colla, Valerie A. Lewis, Lee-Sien Kao, et al, JAMA Internal Medicine, Vol. 176, Issue 8, August 2016, p. 1168; "Changes in Patients' Experiences in Medicare Accountable Care Organizations" By J. Michael McWilliams, Bruce E. Landon, Michael E. Chernew, and Alan M. Zaslavsky, The New England Journal of Medicine, Vol. 371, Issue 18, October 2014, p. 1715.
- "Association of Pioneer Accountable Care Organizations vs Traditional Medicare Fee for Service With Spending, Utilization, and Patient Experience" By David J. Nyweide, Woolton Lee, Timothy T. Cuerdon, et al, JAMA, Vol. 313, Issue 21, June 2015, p. 2152-2161; "Association Between Medicare Accountable Care Organization Implementation and Spending Among Clinically Vulnerable Beneficiaries" By Carrie H. Colla, Valerie A. Lewis, Lee-Sien Kao, et al, JAMA Internal Medicine, Vol. 176, Issue 8, August 2016, p. 1167-1175.
- 11 "Moving Forward with Accountable Care Organizations: Some Answers, More Questions" By Carrie H. Colla, JAMA Internal Medicine, Vol. 177, No. 4 (April 2017), p. 527.

- "Shared Savings Program" Centers for Medicare and Medicaid Services, February 5, 2024, https://www.cms.gov/medicare/payment/fee-for-serviceproviders/shared-savings-program-ssp-acos (Accessed 2/22/24).
- 13 Ibid.
- "Financial Performance of Accountable Care Organizations: A 5-Year National Empirical Analysis" By Joseph Coyne et al., Journal of Healthcare Management, Foundation of the American College of Healthcare Executives, February 2024, https://pubmed.ncbi.nlm.nih.gov/38175536/ (Accessed 2/21/24).
- 15 Ibid
- 16 "Medicare ACOs Saved \$4.2 Billion in 2022 Shared Savings ACOs Continue to Deliver Savings, Improve Health" National Association of ACOs, August 24, 2023, https://www.naacos.com/press-release--medicare-acos-saved--4-2-billion-in-2022 (Accessed 2/22/24).
- 17 "ACO REACH" Centers for Medicare and Medicaid Services, 2024, https://www.cms.gov/priorities/innovation/innovationmodels/aco-reach (Accessed 2/22/24).
- 18 Ibid.
- 19 *Ibid*.
- 20 "Kidney Care Choices (KCC) Model" Centers for Medicare and Medicaid Services, 2024, https://www.cms.gov/priorities/innovation/innovationmodels/kidney-care-choices-kcc-model (Accessed 2/22/24).
- 21 Ibid.
- 22 Centers for Medicare and Medicaid Services, January 29, 2024.
- 23 *Ibid*.
- 24 Ibid.
- 25 *Ibid.*26 *Ibid.*
- 26 *Ibid*.27 *Ibid*.
- 28 "After Slowdown, ACO Participation in Shared Savings Program Grows" By Jacqueline LaPointe, RevCycleIntelligence, January 30, 2024, https://revcycleintelligence.com/news/afterslowdown-aco-participation-in-shared-savings-program-grows (Accessed 2/14/24).
- 29 Ibio
- 30 "Medicare ACO participation spiked in 2024, CMS says" By Alison Bennett, Modern Healthcare, January 29, 2024, https://www.modernhealthcare.com/accountable-care/cms-aco-2024-reach-shared-savings-kidney-care (Accessed 2/14/24).
- 31 Ibia
- 32 LaPointe, RevCycleIntelligence, January 30, 2024.
- 33 "Participation Continues to Grow in CMS' Accountable Care Organization Initiatives in 2024" Centers for Medicare and Medicaid Services, January 29, 2024, https://www.cms.gov/newsroom/press-releases/participationcontinues-grow-cms-accountable-care-organization-initiatives-2024 (Accessed 2/14/24).
- 34 *Ibid.*
- 35 "Accountable care participation grows in 2024" By Maya Goldman, Axios, January 30, 2024, https://www.axios.com/2024/01/30/accountable-care-participation-grows-in-2024 (Accessed 2/14/23).



(800) FYI -VALU

Providing Solutions in an Era of Healthcare Reform

- Firm Profile
- HCC Services
- HCC Leadership
- Clients & Projects
- HCC News
- Upcoming Events
- Contact Us
- Email Us
- Valuation Consulting
- Commercial Reasonableness Opinions
- Commercial Payor Reimbursement Benchmarking
- Litigation Support & Expert Witness
- Financial Feasibility Analysis & Modeling
- Intermediary Services
- Certificate of Need
- ACO Value Metrics & Capital Formation
- Strategic Planning
- Industry Research

LEADERSHIP









Todd A. Zigrang, MBA, MHA, FACHE, CVA, ASA, ABV, is the President of **HEALTH CAPITAL CONSULTANTS** (HCC), where he focuses on the areas of valuation and financial analysis for hospitals, physician practices, and other healthcare enterprises. Mr. Zigrang has over 28 years of experience providing valuation, financial, transaction and strategic advisory services nationwide in over 2,000 transactions and joint ventures. Mr. Zigrang is also considered an expert in the field of healthcare compensation for physicians, executives and other professionals.

Mr. Zigrang is the co-author of "The Adviser's Guide to Healthcare - 2nd Edition" [AICPA - 2015], numerous chapters in legal treatises and anthologies, and peer-reviewed and industry articles such as: The Guide to Valuing Physician Compensation and Healthcare Service Arrangements (BVR/AHLA); The Accountant's Business Manual (AICPA); Valuing Professional Practices and Licenses (Aspen Publishers); Valuation Strategies; Business Appraisal Practice;

and, NACVA QuickRead. Additionally, Mr. Zigrang has served as faculty before professional and trade associations such as the American Society of Appraisers (ASA); the National Association of Certified Valuators and Analysts (NACVA); the American Health Lawyers Association (AHLA); the American Bar Association (ABA); the Association of International Certified Professional Accountants (AICPA); the Physician Hospitals of America (PHA); the Institute of Business Appraisers (IBA); the Healthcare Financial Management Association (HFMA); and, the CPA Leadership Institute.

Mr. Zigrang holds a Master of Science in Health Administration (MHA) and a Master of Business Administration (MBA) from the University of Missouri at Columbia. He is a Fellow of the American College of Healthcare Executives (FACHE) and holds the Certified Valuation Analyst (CVA) designation from NACVA. Mr. Zigrang also holds the Accredited Senior Appraiser (ASA) designation from the American Society of Appraisers, where he has served as President of the St. Louis Chapter. He is also a member of the America Association of Provider Compensation Professionals (AAPCP), AHLA, AICPA, NACVA, NSCHBC, and, the Society of OMS Administrators (SOMSA).









Jessica L. Bailey-Wheaton, Esq., is Senior Vice President and General Counsel of HCC. Her work focuses on the areas of Certificate of Need (CON) preparation and consulting, as well as project management and consulting services related to the impact of both federal and state regulations on healthcare transactions. In that role, Ms. Bailey-Wheaton provides research services necessary to support certified opinions of value related to the Fair Market Value and Commercial Reasonableness of transactions related to healthcare enterprises, assets, and services.

Additionally, Ms. Bailey-Wheaton heads HCC's CON and regulatory consulting service line. In this role, she prepares CON applications, including providing services such as: health planning; researching, developing, documenting, and reporting the market utilization demand and "need" for the proposed services in the subject market service area(s); researching and assisting legal counsel in meeting regulatory requirements relating to licensing and CON application development; and, providing any requested support services required in litigation challenging

rules or decisions promulgated by a state agency. Ms. Bailey-Wheaton has also been engaged by both state government agencies and CON applicants to conduct an independent review of one or more CON applications and provide opinions on a variety of areas related to healthcare planning. She has been certified as an expert in healthcare planning in the State of Alabama.

Ms. Bailey-Wheaton is the co-author of numerous peer-reviewed and industry articles in publications such as: The Health Lawyer (American Bar Association); Physician Leadership Journal (American Association for Physician Leadership); The Journal of Vascular Surgery; St. Louis Metropolitan Medicine; Chicago Medicine; The Value Examiner (NACVA); and QuickRead (NACVA). She has previously presented before the American Bar Association (ABA), the American Health Law Association (AHLA), the National Association of Certified Valuators & Analysts (NACVA), the National Society of Certified Healthcare Business Consultants (NSCHBC), and the American College of Surgeons (ACS).



Janvi R. Shah, MBA, MSF, serves as Senior Financial Analyst of HCC. Mrs. Shah holds a M.S. in Finance from Washington University Saint Louis. She develops fair market value and commercial reasonableness opinions related to healthcare enterprises, assets, and services. In addition she prepares, reviews and analyzes forecasted and pro forma financial statements to determine the most probable future net economic benefit related to healthcare enterprises, assets, and services and applies utilization demand and reimbursement trends to project professional medical revenue streams and ancillary services and technical component (ASTC)

