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Department of Health Care
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Primary Care Payment Structure in ACC Phase III PCMP Education Session; Shared Savings Payments Webinar Questions and Responses

September 25, 2025
12:00 P.M. to 1:00 P.M.

In this session, the Colorado Department of Health Care Policy and Financing (HCPF) provided updates to value based payment programs for primary care medical providers (PCMPs) and Accountable Care Collaborative (ACC) Phase III quality programs. This session focused on Shared Savings Payments. The following questions and answers were shared during the webinar.

Eligibility, Thresholds, and Payment

Can you please reiterate and clarify this change: “thresholds for RAEs and PCMPs will be focused on RAE and provider-specific benchmarks”?

A: Instead of starting from a statewide baseline of what it costs to care for a member with a chronic condition, HCPF is now starting using a provider or region-specific threshold based on historical data for that provider or region.

My understanding is that PCMP referred to a provider group at a single site, not an individual person, correct?

A: Yes, this is correct. We are using PCMP to refer to a site. The TIN refers to a group of PCMPs within the same business that share a tax ID.

What specifically are RAEs being required to do to earn their portion of the savings and how will they be held accountable?

A: RAEs will be expected to support the recruitment process into the Shared Savings program next year. RAEs will also develop regional-level plans that must outline how the RAE will support individual PCMPs and the interventions that will be provided to achieve shared savings in their region.

Presumably the intervention is largely care coordination. If the RAE has delegated care coordination to the practice, does their share of the savings follow the care coordination money? David clarified his question – RAEs have delegated care coordination to practices in some instances – in these cases, does the money follow the care coordination?

A: At this time, there is not a change in the payment level based on delegated care coordination.

Will the small provider pool payouts be related to the performance of the combined practices?

A: PCMPs will be responsible for meeting a quality target and a cost target. In the small provider pool, the cost target is synonymous for all participating providers.



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When will you notify practices if they will be participating in this new program?

A: If you are eligible through the small provider pool, you will need to notify your RAE by 10/15 if you would like to enroll. If you are eligible at the TIN-level, you are automatically enrolled in the shared savings program.

Will there be any replacement programs for pediatricians to participate in?

A: Great question! Yes, pediatric providers will qualify for Access Stabilization Payments, a supplemental payment provided by the RAEs. Your RAE should have reached out to you regarding your eligibility, for which payments are planned to be distributed in January. (Note: Access Stabilization payments are also available for small and rural providers.)

Regarding needing to meet quality benchmark – is that Basecamp? Treeline? Or Summit?

A: Meeting the minimum acceptable threshold on the adult performance track measures is the same as meeting "Basecamp" on those measures.

Member and Service Exclusions

Are genetic conditions excluded like down syndrome?

A: HCPF is not explicitly excluding members with genetic conditions unless they also fall under one of the other exclusion criteria.

What about end stage renal disease (ESRD) patients?

A: At this time, members with ESRD are not excluded. The current exclusions list was developed with clinical feedback and using historic cost data to determine areas that were high cost and less likely to be impacted by PCMPs.

Miscellaneous

When is the first payment for the new ACC 3.0 monthly RAE 1 Primary Care Case Management (PCCM) payment expected, specifically July where the amounts have already been released?

RAE 1 Response: You should have already received your first payment. Second payments are going out shortly. Please reach out to RAE 1 if you have not received the first payment yet.

When will access stabilization payments be distributed? Is this by the RAEs?

A: We're still awaiting federal authorization but expecting to distribute payments in early 2026. These will be distributed through the RAEs.

Will the access stabilization payments be 16% of allowable charges?

A: Access stabilization is repurposing the 16% that was attached to prospective payment in APM 2, but the calculation methodology will be different based on a per-member basis.



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