

From: Albey Wildstein [<mailto:awduplex@aol.com>]
Sent: Tuesday, October 05, 2010 6:12 PM
To: CMS ACO Legal Issues
Cc: Susan Helton; Eric.Norwood@dekalbmedical.org
Subject: COMMENTS ON ACO CONFERENCE 10-5-10

Dear Sirs:

1. ACOs must not "stifle" competition. Large hospital systems and Academic Medical Centers are trying to "grab up" market share by purchasing primary care and specialty practices. They seem to consider the ACO "just another network" without providing a better care product.

Therefore, you should encourage those networks of private practice physicians and non-acquiring smaller hospitals that are creating a better care alternative via true cooperative and collegial clinical integration and pay for performance models. You should encourage multiple such ACOs in a market, provided they are competent.

2. Encourage commercial payers to work with such private practice models without legal or regulatory fear of reprisal from you.
3. Encourage the option of physician exclusivity so long as the ACO offers a consistent commitment to cooperation, clinical integration, and patient centric outcome tracking (all payer data warehousing). Every man for himself simply won't work.
4. Remember that there are many examples of clinical integration models that are successful now and you should find out more about them. I believe ours is one of them. I am happy to share it with you or whomever you think appropriate.

The conference was excellent.

Albert Wildstein MD
Chairman, Dekalb Physician-Hospital Organization
Decatur, Georgia

awduplex@aol.com

Sent from my iPad