May 29, 2025

The Honorable Mike Johnson
Speaker
U.S. House of Representatives
H-232, The Capitol
Washington, DC 20515

The Honorable Hakeem Jeffries
Democratic Leader
U.S. House of Representatives
H-204, The Capitol
Washington, DC 20515

The Honorable John Thune
Majority Leader
U.S. Senate
S-230, The Capitol
Washington, DC 20510

The Honorable Charles Schumer
Democratic Leader
U.S. Senate
S-221, The Capitol
Washington, DC 20510

Re: Congress Must Act to Sustain Medicare's Transition to Advanced Alternative Payment Models (APMs)

Dear Speaker Johnson, Leader Thune, Leader Jeffries, and Leader Schumer:

On behalf of the 24 undersigned physician and health care associations and more than 550 accountable care organizations (ACOs), health systems, hospitals, physician practices, health clinics, and accountable care stakeholders **we call on Congress to support continued investment in Medicare's transition to advanced APMs that take on accountability for costs and outcomes of their patient populations.**

APMs reduce health care spending and improve outcomes by providing physicians, hospitals, and other health care providers with incentives and tools to manage patient populations proactively. APMs focus on management of chronic conditions and reward prevention across the continuum of care. This approach has proven successful with Medicare as ACOs, the largest APM in Medicare, lowered spending by more than $28 billion over the last decade.[1] Physicians and other health care providers in ACOs also consistently outperformed clinicians in non-value-based payment models on quality measures, including preventive care measures. [2] Moreover, these reforms have produced a spillover effect that improves care and lowers costs for patients across the health care system.

Medicare's transition to advanced APMs was made possible by the financial incentive payments and regulatory flexibility that Congress included in the bipartisan Medicare Access and CHIP Reauthorization Act of 2015 (MACRA). The incentive payments and exemptions from costly regulatory burdens helped drive participation in advanced APMs with more than 500,000 clinicians now participating and bearing downside financial risk for their Medicare patients[3] and 53.4 percent of beneficiaries with Traditional Medicare now in an accountable relationship with their clinician.[4] The advanced APM incentive payments allow physicians, hospitals, and other health care providers to cover the upfront and ongoing investments necessary to improve patient outcomes and

[1] https://valuebasedcare.org/wp-content/uploads/2025/02/AAPM-Materials-Legislative-Priorities-Feb2025.pdf
[2] https://www.cms.gov/newsroom/press-releases/medicare-shared-savings-program-continues-deliver-meaningful-savings-and-high-quality-health-care
[3] https://www.federalregister.gov/documents/2024/12/09/2024-25382/medicare-and-medicaid-programs-cy-2025-payment-policies-under-the-physician-fee-schedule-and-other
[4] https://www.cms.gov/newsroom/fact-sheets/cms-moves-closer-accountable-care-goals-2025-aco-initiatives

expand services not covered by traditional Medicare. Incentive payments help fund wellness programs, patient transportation, meal programs, cost-sharing support for beneficiaries, and expanded access to care coordinators.

While we have seen steady growth for advanced APMs in recent years, 2025 is a pivotal year for Medicare's value transformation. The expiration of Medicare's advanced APM incentive payments and sharp increase in qualifying thresholds is creating significant challenges for physician practices and hospitals as they plan for the years ahead. The financial uncertainty reduces the capacity of practices to manage complex patients, particularly in rural and underserved areas. The sharp increase in advanced APM qualifying thresholds will involuntarily push more clinicians back into the Merit-based Incentive Payment System (MIPS) program, which will mean more physician practices and hospitals will have to incur higher costs and regulatory burdens associated with MIPS reporting.

We urgently ask lawmakers to continue supporting the movement to value-based care by prioritizing the extension of Medicare's advanced APM incentive payments and stopping the drastic increase in qualifying thresholds, as called for in the bipartisan bicameral Preserving Patient Access to Accountable Care Act (H.R. 786/S. 1460). Addressing these critical issues as soon as possible will ensure that physicians, hospitals, and other health care providers have the resources and regulatory certainty needed to support beneficiaries' continued access to high quality, patient-centered care.

Thank you for your attention to this important matter. Our organizations look forward to your continued leadership in support of Medicare providers and the patients we serve.

Sincerely,

America's Physician Groups
Health Care Transformation Task Force
Premier Inc.
American Academy of Family Physicians
American Association of Medical Colleges
American College of Physicians
American Society for Radiation Oncology
AMGA
Florida Association of ACOs
National Rural Health Association
Primary Care Collaborative
Texas Association of ACOs
American Medical Association
National Association of ACOs
Accountable for Health
American Academy of Neurology
American Association of Orthopaedic Surgeons
American Osteopathic Association
America's Essential Hospitals
Association for Clinical Oncology
Medical Group Management Association
Partnership to Empower Physician-Led Care
Renal Physicians Association
The Society of Thoracic Surgeons

cc

Chairman Mike Crapo
Chairman Brett Guthrie
Chairman Jason Smith
Ranking Member Ron Wyden
Ranking Member Frank Pallone
Ranking Member Richard Neal

Accountable Care Organizations; Health Systems; Hospitals; Medical Practices; Health Clinics; and Accountable Care Stakeholders

ACME Health Partners ACO (GA)
AdvantagePoint Health Alliance – Bluegrass, LLC (KY)
AdvantagePoint Health Alliance – Hot Springs, LLC (AR)
AdvantagePoint Health Alliance – Northwest, LLC (ID, MT, OR, WA)
AdvantagePoint Health Alliance – Western North Carolina, LLC (NC)
Advocate Health (GA, IL, NC, SC, WI)
Aledade (61 ACOs Nationwide)
American Choice Healthcare (CA, FL, IL, IN, MD, MO, NJ, NV, NY, OK, PA, TX, VA)
Arvon CIN (MI)
Associates for Women's Medicine (NY)
Atlantic ACO (NJ)
AtlantiCare Health System (NJ)
Baptist Health (AR)
Bellin Health Partners (MI, WI)
Bluestone Physician Services (MN)
Bridges Health Partners (PA)
Care Partners ACO LLC (CA, FL, MA, NE, NJ, NY, NC, OH, OK, SD, UT)
Carondelet Regional Medical PC (NY)
Central Florida ACO (FL)
Chelsea Management Group LLC
CHESS Health Solutions (NC, VA)
Christian Health Service of Syracuse (NY)
CMG ACO, LLC (CT, NY)
Coastal Carolina Health Care, PA (NC)
CommonSpirit Health (AZ, AR, CA, CO, GA, IA, NE, TN, TX, WA)
Community Care Collaborative of PA & NJ
Community Health Provider Alliance (CO)
Crossroads Family Medicine (KY)
Duke Connected Care, LLC (NC)
Eastern Virginia Medical School (VA)
Essentia Health (MN, ND, WI)
Freedom Healthcare Alliance, LLC (SC)
Gastroenterology and Hepatology of CNY
GenieMD Medical Group (FL)
GGC ValueCare LLC (KY)
Health Choice Care (FL, HI, MO, NC, RI)
Health Choice Network (FL)
HealthPartners (MN)
HPOF Holdings LLC dba Independent Healthcare Partners (FL)
IHCI ACO LLC (IN, KY)
Illinois Rural Community Care Organization (IL)
Indiana Lakes ACO (IN, MN)
Innovacare Health (FL)
Integra Community Care Network, LLC (RI)
Invio Health Network (SC)
Labcorp (National)
Legacy Care, LLC (VA)
Little River Medical (VA)
MaineHealth (ME, NH)
Accelerando Advisors LLC
AdvantagePoint Health Alliance – Blue Ridge, LLC (NC, VA)
AdvantagePoint Health Alliance – Great Lakes, LLC (MI, WI)
AdvantagePoint Health Alliance – Laurel Highlands, LLC (PA)
AdvantagePoint Health Alliance – Tennessee Valley, LLC (AL, TN)
AdventHealth (FL)
agilon health (OH, NC, NY, PA, TX)
AlignMed Partners (PA)
Americas MDE (FL, IL, NJ, NY, OK)
Arizona Care Network (AZ)
Ascension (FL, IL, IN, OK, TN, TX, WI)
Assurity DCE (DC, FL, MA, VA)
Atlantic Health System (NJ)
Avera Health (IA, MN, SD)
Baylor Scott & White Health (TX)
Better Health Group (AL, FL, GA, MI, OK, TN, TX)
Bon Secours Mercy Health (OH)
Buena Vida y Salud LLC (TX)
CareAllies Accountable Care Solutions LLC (AZ, PA, TX)
CCA Health ACO (MI)
Central MN ACO (MN)
Central Virginia Coalition of Healthcare Providers, LLC (VA)
Cleveland Clinic (OH)
CNY Foot Surgery And Podiatry Care (NY)
ColigoCare, LLC (NJ, NY)
Commonwealth Primary Care ACO (AZ, NC, TX)
Community Care Partnership of Maine
Connectify Health
Curana Health (TX)
Dupre Medical Clinic (LA)
Esse Health ACO (IL, IN, MO, OH)
Evolent Care Partners / The Accountable Care Organization, Ltd. (CA, FL, HI, KS, KY, MI, NY, NC, PA, TX)
Generation Clinical Partners LLC (MO)
Georgia Medical Clinic (GA)
Harding Memorial Healthcare (OH)
Health Choice Community Partners (AR, FL, IL, KY, RI, TX)
Healthcare Solutions Network (IN, KY, OH)
Howard County Medical Center (NE)
Huddle Health Medicine (NY)
IHCI ACO Midwest LLC (IL)
Imperium Health (AL, AR, IN, KY, LA, OK, PA, TN, VA)
Indiana University Health ACO, Inc. (IN)
Innovation Care Partners (AZ)
INTEGRIS Health (OK)
Jefferson Health (NJ, PA)
Lancaster General Health Community Care Collaborative (PA)
Liberty Doctors, LLC (SC)
LTC ACO (MD, MA, MO, NH, OH, PA, TX, VA, WV)
Mass General Brigham (MA)

McAuley Health Partners ACO, LLC (MI)
MCM Accountable Care Organization LLC (FL)
Meza Post Acute & Long Term Care, PLLC (ID)
Mission Health Partners (NC)
Mount Sinai Health Partners (NY)
MultiCare Health Partners ACO (ID, WA)
Nebraska Health Network (IA, NE)
Nivano Physicians Inc ACO REACH (CA)
Northern Ohio Medical Specialists, LLC (OH)
Novant Health (NC, SC)
Ochsner Accountable Care Network (AL, LA, MS, TX)
On Belay Health Management Services, LLC (MA)
OneCare Vermont ACO (VT)
OneHealth Nebraska ACO (NE)
Optum (AZ, CA, CO, NM, NV, NY, OH, OR, SC, WA, WI)
PBACO Holding, LLC (DC, FL, GA, NY, SC)
Penn Medicine (DE, NJ, PA)
PERSIVIA (MA)
Physician Organization of Michigan Accountable Care Organization, LLC (MI)
Physicians' Primary Care of Southwest Florida (FL)
Premier Health ACO LLC (NJ, PA)
Primary PartnerCare ACO Independent Practice Association, Inc (NY)
Prime Care Managers (TX)
Privia Medical Group North Texas (TX)
Privia Quality Network Gulf Coast II, LLC (OR, TX, WA)
Privia Quality Network, LLC (DC, MD, VA)
Providence, Health Connect Partners ACO (WA)
Rancho Health Management ACO (CA, IL, TN)
Rome Health (NY)
Sertus (TX)
SoNE Healthcare (CT, MA)
Southeast Medical Group (GA)
Space Coast ACO LLC (FL, MI, NJ)
Spatially Health (FL)
St. Luke's University Health Network (PA)
Stellar Health ACO LLC (AR, MI, MN, NH, NY, PA, VA, WV)
Summit Health-VillageMD (NJ)
TC2, LLC (GA)
Trinity Health New York (NY)
TriValley Primary Care, PC (PA)
Tryon ACO, LLC (NC, SC)
UChicago Medicine (IL)
UNC Senior Alliance/UNC Health (NC)
Unity Healthcare, LLC (IN)
Universal Health Services (NV)
VillageMD Primary Providers II, LLC (CT, MI, TX)
VillageMD Primary Providers V, LLC (FL, GA, NV, TX)
WellMed GTX ACO (NM, TX)
WellSpan Health (MD, PA)
West Florida ACO (FL)
Westchester Medical Group (NY)
McLaren High Performance Network LLC (MI)
MedOne Healthcare Partners (OH)
Millenium Physician Group (NC, FL, TX)
Mount Carmel Health, Trinity Health (OH)
MultiCare Connected Care (ID, WA)
MyDirectives (TX)
New England Orthopaedic Center (CT)
North Georgia Healthcare Partnership, Inc. (GA)
Northfield Hospital + Clinics (MN)
NW Momentum Health Partners ACO (WA)
Ochsner Senior Care Network, LLC (AL, LA, MS)
On Belay Health Solutions (CT, FL, GA, IN, MA, ME, MS, NH, NJ, NY, OH, OK, RI, SD, TN, TX, VA)
Optimus ACO (NJ)
PA Clinical Network (PA)
Pearl Health, Inc. (AL, AR, AZ, CA, CT, DC, FL, GA, HI, ID, IL, KY, LA, MA, MD, ME, MI, MN, MS, MT, NC, NH, NJ, NM, NV, NY, OH, OR, PA, RI, SC, TN, TX, UT, VA, VT, WA, WI, WV)
Physician Quality Partners (NC)
Piedmont HealthCare (NC)
PQN - Georgia, LLC (GA)
Primary Care Alliance (FL)
Primary Partners (FL)
Privia Health + Privia Medical Group (VA)
Privia Quality Network Central Florida, LLC (FL)
Privia Quality Network Maryland LLC (DC, MD)
Prospect ACO (MA, RI)
PSW ACO (WA)
Responsive Care Solutions (AR, CO, FL, KS, KY, MD, MA, MN, NJ)
Saint Francis Health System (OK)
Silver State ACO (AZ, NV)
Sound Long-Term Care Management ACO (Nationwide)
Southwestern Health Resources (TX)
Sparx (NY)
St. Peter’s Health Partners (NY)
St. Mary's Healthcare (NY)
Stormont Vail Health (KS)
Trinity Health (St. Peter’s) (NY)
Trinity Health Integrated Care ACO (DE, ID, IL, IN, MD, MI, NY, OH, PA)
Trinsic Clinically Integrated Network (CO)
Tryon Medical Partners (NC)
UNC Health Alliance (NC)
United Physicians, INC (IPA serving over 850 physicians) (SC)
Unity Healthcare, LLC (IL, IA)
VillageMD (IL)
VillageMD New Hampshire ACO, LLC (NH)
VillageMD Primary Providers III, LLC (AZ)
VillageMD Primary Providers, LLC (CO, KY, TX)
Wellvana (Nationwide)
West Michigan ACO (MI)

ACO Medical Practices

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Associated Family Physicians, Inc. (CA)
Auburn Medical Group, Inc. (CA)
Bay Family Medical Group, INC (CA)
Capitol Internal Medicine Associates (CA)
Deyi Zheng, M.D., Inc. (CA)
Dina Sverdlov, M.D. (CA)
Doctors In, Inc. (CA)
Douglas Young, MD Inc. (CA)
Folsom Lake Primary Care (CA)
Glatt Medical (CA)
Greenhaven Family Practice (CA)
John C. Chow (CA)
Kenan & Wang, LLC (CA)
Kurtis Fox, M.D. (CA)
Lakowsky and Batlin Medical Corp. (CA)
Lily Enayati, M.D., Inc. (CA)
Lincoln Medical Associates (CA)
M, Nadir Alocozy, M.D., Inc. (CA)
Purisima Family Medicine (CA)
Rocklin Family Practice & Sports Medicine (CA)
Sayed A. Hussain, M.D., Inc. (CA)
Stephen Carney, M.D. (CA)
Teng Medical Foundation (CA)
Tommy T. Kuo, M.D. (CA)
Vista Complete Care, Inc. (CA)
Xin-Nong Li M.D., Inc. (CA)
Adult Medicine of Lake County, Inc. (FL)
Bond Clinic, P.A. (FL)
Domus Care Solutions (FL)
VitalMD Group Holding, LLC (FL)
Carmen Baybayan, M.D., LLC (HI)
Curtis Takemoto-Gentile, M.D., Inc. (HI)
Dr. Russell M. Tom, LLC (HI)
Kihei-Wailea Medical Center, LLC (HI)
Manakai O Malama (HI)
St. Luke's Clinic - Ala Moana (HI)
Thomas K S Tan M.D., Inc (IN)
Gill Medical & Geriatric Associates, LLC (IN)
Greentree Primary Care (IN)
Sellersburg Internal Medicine and Pediatrics (IN)
Sunflower Medical Group P.A.(KS)
Clover Fork Outpatient Medical Project, Inc. (KY)
Dennis S. Gray M.D., PSC (KY)
Drs Borders & Associates (KY)
Greater Louisville Internal Medicine (KY)
LaGrange Family Care Doctors (KY)
Medical Associates Southern KY
Monticello Medical Associates, Inc. (KY)
Primary Care Centers of Eastern Kentucky, LLC (KY)
Arthritis & Joint Center Of Florida LLC (FL)
Azzam Adhal (FL)
Brevard Health Group LLC (FL)
Devoted To Women, P.A. (FL)
Health First Privia Medical Group, LLC (FL)
Healthpoint Medical Group Of The Emerald Coast, LLC (FL)
Jeffrey T Obrien MD Inc (FL)
Myra Reed MD PA (FL)
Orange Blossom Womens Group PLLC (FL)
Parveen S. Vahora MD PA (FL)
Pedro Ylisastigui. M.D.P.A. (FL)
Premier Family & Sports Medicine, LLC(FL)
The Family Clinic LLC (FL)
C. Thomas Bevill Iii Md, PC (GA)
Frederick R. Yarid, M.D. (GA)
Garrett Family Medicine LLC (GA)
High Mountain Healthcare, LLC (GA)
Hillandale Internal Medicine P.C. (GA)
Jorge Amador Md LLC (GA)
Lawrence A. Adjei, APMC (GA)
Mcintosh Clinic, PC (GA)
Middle Georgia Family (GA)
Perisseia Physicians, LLC (GA)
Perry Family Practice LLC (GA)
Prime Care Medical Services Inc (GA)
Southcoast Medical Group LLC (GA)
Suzanne L. Nunn, MD PC (GA)
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Tate Medical Associates, LLC (GA)
The Corporation Of Mercer University (GA)
The Veranda, PC (GA)
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Head2Toehealth (MD)
Husna R Baksh MD PC (MD)
Kannan And Associates PC (MD)
Kathryn D Kelly MD PC (MD)
Matcare LLC (MD)
Parmar Primary Care Medicine LLC (MD)
Privia Care Center LLC (MD)
Sankofa Health, LLC (MD)
Savopoulos Professional, LLC (MD)
Silver Spring Medical Center LLC (MD)
Usha Sivakumar MD LLC (MD)
Well-Being Medical Care, LLC (MD)
Wellspring Family Medicine PC (MD)
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Newbridge Spine And Pain Center LLC (MD)
Bay West Endocrinology Associates PA (MD)
Denise Chevalier Hamilton (MD)

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Clarkston Internal Medicine (MI)
Progressive Health Care P.c. (MI)
Silver Pine Medical Group Plc (MI)
Aegis Medical Center (NC)
Alvi Prime Time Clinics, Pllc (NC)
AMM Healthcare (NC)
Boice-Willis Clinic (NC)
Capital Family Physicians, P.A. (NC)
Cary Healthcare Associates, P.A. (NC)
Cary Internal Medicine And The Diabetes Center (NC)
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Generations Family Practice, P.A. (NC)
Imperial Center Family Medicine And Immediate Care (NC)
Internal Medicine Pediatrics Associates, P.A. (NC)
Jacksonville Children's and Multispecialty Clinic, PA (NC)
Jacobs And Van Cleeff Internal Medicine, PC (NC)
North Carolina Internal Medicine, PC (NC)
Raleigh Family Practice, P.A. (NC)
Raleigh Medical Group, P.A. (NC)
Rocky Mount Family Medical Center PA (NC)
RSI Medical PA (NC)
Sea Breeze Family Practice PA (NC)
Shah And Associates Family Practice(NC)
Wake Internal Medicine Consultants, Inc. (NC)
Western Wake Wellness(NC)
CNY Family Care (NY)
Middletown Medical (NY)
Northern Medical Group, PLLC (NY)
Family Practice Center, PC (PA)
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Family Medical Center of Georgetown, P.A. (TX)
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Joseph A Marotta MD PA (TX)
Kendall Wong M.D. (TX)
Kevin Stephens MD PA (TX)
Legends Medical Clinic PLLC
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North Austin Family Medicine, PA (TX)
North Houston Family Medicine (TX)
North Star Family Medicine P.A. (TX)
Odessa Consultants, PLLC (TX)
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GP Therapy, LLC (MD)
Greenway Endocrinology, P.A. (MD)
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Allergy And Asthma Clinic Of Maryland (MD)
Forsyth Medical Group, Llc (NC)
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Cheryl Clark-Brown (TX)
Complete Care Obgyn And Family Medicine PLLC (TX)
Doctors Clinic Of Spokane P S (WA)
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Family Medicine Associates Of Conroe PLLC (TX)
Family Practice Associates, P.A. (TX)
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Hospital Internists Of Texas Clinic PLLC (TX)
Jennifer Gwozdz (TX)
Lewis Family Medicine (TX)
Lori Naglieri, Md, PA (TX)
Medina Lake Clinic PA (TX)
Narendra Punjabi Md PA (TX)
Privia Medical Group Gulf Coast PLLC (TX)
Privia Medical Group West Texas, PLLC (TX)
San Antonio Family Physicians (TX)
Spangler Medical Enterprises, PA (TX)
St. Elizabeth Family Care, LLC (TX)
Waco Primary Care, P.A. (TX)
Privia Medical Group LLC (VA)
Central Virginia Family Physicians, Inc. (VA)
Virginia Head And Neck Surgeons PC (VA)
Virginia Womens Center Inc (VA)
Lawrence Miller (VA)
IPS of Winchester LLC (VA)
Betsy Vasquez (VA)
Mount Vernon Internal Medicine (VA)
Anchor Healthcare PLC (VA)
Matthew S. Kaatz, M.D. P.C. (VA)
Neda Hashemi MD PC (VA)
Capital Heartcare Center PC (VA)
Next Journey Orthopaedics PLLC (VA)
Ronald W Atwood Md PC (VA)
Chickahominy Family Practice Inc (VA)
Providence Family & Sports Medicine Inc (VA)
Felice Physical Therapy (VA)
Metro Orthopedics & Sports Therapy (VA)
Best Health Services PC (VA)
Prismamed Services LLC (VA)
Prime Medical Care, LLC (VA)
Accessible Physician Home Care, LLC (VA)
Nephrology & Hypertension Of Virginia, PLLC (VA)
Ortho OIC Orthopaedic Immediate Care LLC (VA)
Anju Verma MD PC (VA)
Walla Walla Clinic, Inc. (WA)

Rajesh J Patel, M.D., P.A. (TX)
Sammy Lerma III, MD, PA (TX)
Shaun Kretzschmar, D.O., P.A., Aledo Family Medicine (TX)
Shroff Cardiology & Internal Medicine Clinic, P.A. (TX)
Shylesh Ganta M.D., P.A (TX)
South Texas Internal Medicine Associates (TX)
Subodh K Mallik, MD (TX)
Suresh Prasad Md PA (TX)
Texas Alliance Medical Group, PA (TX)
Vikram R. Vadyala, M.D., PLLC (TX)
Vytalus Medical Group PLLC (TX)
Welcome Family Medicine, PA (TX)
Family Medicine Inc. (VA)
Michele D. Trippel, M.D. (VA)
Stephens City Family Medicine LLC (VA)