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What the LEAD benchmark rewards, and what it quietly punishes.

CMS LEAD payment structure ? zero customer data. Figures from the engine and Source Register.

1. DATED FACTS

? LEAD is a 10-year voluntary ACO model beginning 1 January 2027.

CMS: LEAD (Long-term Enhanced ACO Design) Model

<https://www.cms.gov/priorities/innovation/innovation-models/lead>

? The performance period runs without rebasing.

CMS: LEAD Model Overview

<https://www.cms.gov/priorities/innovation/files/lead-model-overview.pdf>

? The benchmark is a three-year weighted average of 2024, 2025 and 2026 claims.

CMS: Centers for Medicare & Medicaid Services Long-term Enhanced ACO Design (LEAD) Model FAQ

<https://www.cms.gov/priorities/innovation/files/lead-tech-faqs.pdf>

? For ACOs new to accountable care those years are weighted 10% / 30% / 60%.

CMS: LEAD Model Payment Factsheet

<https://www.cms.gov/priorities/innovation/files/lead-payment-fs.pdf>

2. THE IMPLICATION

If you are new to accountable care, most of your ten-year benchmark is being set by the claims you are generating this quarter. A dollar of avoidable spend you remove before 31 December 2026 mostly comes out of your own benchmark, and you carry that benchmark until 2036.

BY3 absorption share 60% [measured] (benchmarkAbsorptionShare)

3. WHAT CMS TAKES

Item Share Applies to

Quality withhold 3% [measured] All LEAD ACOs (earnable back through quality)

Explicit discount (Global) 1.75%?3% [measured] Global risk option only ? taken off the benchmark first

Shared-savings retention Global 100% ? Professional 50% [measured] Two LEAD risk options (savings and losses)

4. WHAT FOLLOWS

Measure this year. Intervene at PY1.

Once ordering behaviour changes, nobody can reconstruct what would have happened under the old pattern. A locked counterfactual is how you know whether the programme moved the needle ? and it cannot be built after the intervention has entered the claims.

Method: <https://arkahealth.com/evidence/methodology#counterfactual-construction>

5. THE OFFER

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1. Free baseline from your claims extract.
 2. Turnaround: ten business days from receipt.
 3. If you never buy anything, you keep the report.

Our attribution method is published in full, before you ask.

<https://arkahealth.com/evidence/methodology#tcoc-attribution-method>

There are no FHIR scopes, because there is no integration.

? end of note ?