Listening Session 3: Financial Incentives and Performance Metrics Related to Primary Care and Specialty Integration

Presenters:
Subject Matter Experts
- Amol Navathe, MD, PhD, Co-Director, Healthcare Transformation Institute, Director, Payment Insights Team, and Associate Director, Center for Health Incentives and Behavioral Economics, University of Pennsylvania; Physician and Core Investigator, Philadelphia Veterans Affairs Medical Center; and Commissioner, Medicare Payment Advisory Commission, US Congress
- Mark Friedberg, MD, MPP, Senior Vice President, Performance Measurement & Improvement, Blue Cross Blue Shield of Massachusetts
- Eric C. Schneider, MD, MSc, Executive Vice President, National Committee for Quality Assurance (NCQA)

Previous Submitter
- Brian Bourbeau, MBA, Division Director, Practice Health Initiatives, American Society of Clinical Oncology (ASCO); Patient-Centered Oncology Payment Model (PCOP) proposal
Coordinating Specialty and Population-Based Payment Models

Amol Navathe, MD, PhD
University of Pennsylvania
Commissioner, MedPAC
@amolnavathe

Physician-Focused Payment Model Technical Advisory Committee (PTAC)
September 20, 2022
Population-Based Versus Specialty-Based Models

**Population-Based:**
- Improve quality
- Reduce hospitalizations and other acute care
- Improve efficiency in post-acute care
- Lower the total cost of care as well as Medicare spending

**Specialty-Based:**
- Reduce cost and variability
- More focused and practical for hospital/organization alignment
- More options for policymakers to incentivize participation

@amolnavathe
Key Policy Questions on Value-Based Payment Models

- Impact on Cost and Quality
- Where Savings are Located
- Volume Effect
- Case Mix Effect
- Standardization of Care
- Spillovers
- Voluntary vs Mandatory
- Overlap with Other APMs
Why Does APM Overlap Matter?

CMS Goal: Near-universal participation in value-based payment models by 2030.

• Comprehensive strategy likely requires both population-based and episode-based models

• Need to harmonize models across the continuum of care (i.e., population-based) with those that target specific diseases/events/sites (i.e., episode or bundled payment).

• There could be synergies or redundancies

• Medicare policy has potentially discouraged rather than encouraged model overlap
Key Questions with Evidence

JAMA Health Forum™

Original Investigation
Association of Patient Outcomes With Bundled Payments Among Hospitalized Patients Attributed to Accountable Care Organizations

Amol S. Navathe, MD, PhD; Joshua M. Liao, MD, MSc; Erkuan Wang, MS; Ulysses Isidro, MPH; Jingsan Zhu, MS, MBA; Deborah S. Cousins, MSPH; Rachel M. Werner, MD, PhD

1) What is the impact of overlap between ACOs and bundled payments on patient outcomes?

2) How does this vary for medical conditions vs. surgical episodes?
Study Details

- ACOs - MSSP ACOs from 2012 – 2018
- Bundled Payments - BPCI Episode Initiators from 2013-2018
- Design – Examine how ACO status modifies the bundled payment “effect”
- Robust design that mitigates confounding:
  - “within-ACO” (for BPCI vs. non-BPCI)
  - “within-hospital” (for ACO vs. non-ACO)
Overlap in ACOs and Bundles Lowers Spending for Medical Conditions
Overlap in ACOs and Bundles Reduces Readmission Rates for Medical Conditions
Overlap in ACOs and Bundles Reduces Readmission Rates for Surgical Procedures

**Secondary outcomes**

- Mortality
  - Non-ACO
  - ACO
  - ACO vs non-ACO

- Readmission rate
  - Non-ACO
  - ACO
  - ACO vs non-ACO

- Discharge to SNF/IRF
  - Non-ACO
  - ACO
  - ACO vs non-ACO

- Discharge to HH
  - Non-ACO
  - ACO
  - ACO vs non-ACO

Episode outcomes
Bundled Payments Seem To Work Well Together With Other Value-Based Payment Models Like ACOs

Overlap between ACOs and bundle payments was associated with:

- **Medical**: Lower spending and fewer readmissions
- **Surgical**: Fewer readmissions

First evidence to date of overlap synergies

- Benefits of model overlap are larger when clinical complexity is greater (CHF > knee replacement)

Important for policymakers to consider deliberate policy design to

- Fairly distribute savings
- Encourage overlap (?)
Hierarchical Payment Models—A Path for Coordinating Population- and Episode-Based Payment Models

In November 2021, the Centers for Medicare & Medicaid Services (CMS) announced a strategy to achieve near-universal participation in value-based payment models by 2030. The core of this strategy is the goal that every beneficiary should be in a clinical care relationship that has accountability for quality and total cost of care. Achieving this goal will require harmonizing the CMS foundational value-based payment models that focus on accountability across the continuum of care (i.e., population-based models) with those that target specific diseases, acute events, or sites of care (i.e., episode or bundled payment models).

With more than 20 ongoing value-based payment programs, models often overlap. This creates a complex environment for healthcare organizations to make decisions about participation, care redesign, and investments. This environment also limits the rigor of model testing, isolating the effect of a model may be nearly impossible, leading to a situation in which singular models are not deemed successful despite contributing to system-level improvements in quality and cost.

Amidst this complexity, articulating how to coordinate population- and episode-based payments could serve to catalyze reform and focus payment and delivery system innovation, much in the way that then-Secretary Sylvia Mathews Burwell of the US Department of Health and Human Services did for value-based payments in 2015. Payment models, such as market-level mandatory participation for lower-extremity joint replacement bundles.

Episode-based models are not appropriate for all care, add complexity when episodes are co-occurring (e.g., a patient frequently admitted for pneumonia and chronic obstructive pulmonary disease exacerbations), and do not incentivize episode-triggering use such as hospitalization or surgery in the first place (although research does not suggest this is a problem to date). Population-based and episode-based approaches must be coordinated to create synergies between them, address their shortcomings, and support healthcare organizations across the spectrum of types, settings, size, and experience with risk.

Population- and Episode-Based Payments

Policy design should ensure episode-based payments, and any other payment approach tested, complement a foundational, population-based model. To maximize participation and accomplish the goal of aligning every beneficiary with an accountable entity, it will be important for the population-based approach to use multiple pathways for different types of participants (e.g., those with experience in population management and those who do not have any experience) based on varied design attributes like the amount of downside risk and the incentives to participate. As a result, the role of episode-based payment may vary by pathway.
Hierarchical Payment Model

- **ACO → coordinating entity**

- **Create episode-based payment systems for specific conditions and procedures for which:**
  1) episode-based payment can create efficiencies that population-based models would not likely generate alone
  2) there is evidence that episode payment improves cost, outcome quality, or both.

Global budget of population-based model as the “umbrella of accountability” under which episode-based payments are applied
Benefits of Coordinated Payment Models

Create **closer collaboration** among primary care clinicians, specialists, and facilities.

Create a **blueprint and flexibility for reimbursing** specialists and facilities within coordinated population-based and episode-based models.

- Organizations in population-based models would earn savings when episode-related care is delivered by efficient clinicians.

- Clinicians providing care would earn savings within the episode.

Preserve **successful episode-based models** and support continued innovation.
Do NOT Forget Value ≠ Equity

- **Greater financial accountability** on physicians and hospitals has not historically led to more equitable outcomes.

- **Risk-adjustment tends to be incomplete** for marginalized groups.

- **Clinicians may avoid** patients from marginalized groups and/or participation in value-based payment models.

Make **equity an explicit goal** of any new value-based model (build equity into metrics and financial incentives).

Measure **disparate impact** on access and quality for disadvantaged populations via expedited reporting and data collection.
Thank You!

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FUTURE DIRECTIONS FOR QUALITY MEASUREMENT IN POPULATION-BASED TOTAL COST OF CARE CONTRACTS

PTAC
Sept 20, 2022
Mark Friedberg, SVP, Performance Measurement & Improvement, Blue Cross Blue Shield of Massachusetts
• Longstanding principles won’t change. For high-stakes uses (including payment), quality measures must be:
  • Valid
  • Important
  • Reliable

• Evolution of quality measurement in AQC will stem from improving measure validity and extending high-stakes measurement into areas of increased importance

• Reliability is an ever-present concern, operationalized as a filter on candidate measures (already valid and important) for a given provider group
  • In other words, validity and importance come first. Then reliability.
IMPROVING MEASUREMENT VALIDITY

• Measures of shared decision making (SDM)
  • Assess the degree to which decisions are consistent with medical science and individual patient values & preferences
  • Ethically superior construct, compared to guideline adherence without regard to individual patient values & preferences
  • SDM measures could replace most legacy measures for primary care (e.g., cancer screening, chronic condition management)
  • Best measured via patient surveys using uniform fielding methods

• Patient-reported outcomes

• Patient-reported access to mental health services
• Measures of equity
  • Differences between groups of patients for which no systematic differences are ethically tolerable (e.g., racial inequities)
  • BCBSMA incorporating pay-for-equity (P4E) into AQC now

• Measures of clinical decision making
  • Structured implicit review of clinicians’ decisions, including their rationale
  • Examples limited to research, so far

See
1. Health Equity Report
2. Press Release on P4E plans
INCENTIVES ALONE ARE NOT ENOUGH, ESPECIALLY FOR NEW MEASURES

Adding equity to the Alternative Quality Contract (AQC) triad, for example

Confidential Equity Reports to all AQC providers distributed September 2021, to be updated at least annually

Pay for Equity Incentives added to AQC payment program beginning January 1, 2023, for earliest provider groups

Equity Action Community with Institute for Healthcare Improvement launched November 2021

Health Equity Grants to contracted provider organizations in 2022-2023 that participate in the Equity Action Community
THANK YOU
Health Care Quality and Total Cost of Care Payment Models

Eric C. Schneider, MD, FACP
Executive Vice President
Questions

➢ What quality accountability infrastructure is needed to support payment models based on total cost of care?

➢ How will quality accountability systems address key drivers of both health and spending (unmet social needs, community inequities, lack of access)?
To Improve Health Outcomes Address Unmet Social Needs

The Argument for Health Care Intervention

40 to 55% of health outcomes attributable to social determinants of health outside the traditional health care system

Black and Native American infant mortality rates 2x higher than White infants (Artiga, 2019)

Hispanic individuals 60% more likely to die from viral hepatitis than White individuals, despite lower rates of Hepatitis C (OMH, 2020).

Black, Native American and Native Hawaiian individuals receive worse care than White individuals on 4 out of 10 health care access measures (AHRQ, 2019).

From 2003-2006, total cost of health inequities and premature death estimated at $1.24 trillion (APHA, 2019)

In one Medicaid program, 43% of diabetes cost ($225M) avoidable if racial & economic disparities addressed (Buescher, 2010)
Wide-Ranging Impact

Unmet social needs broadly felt, regardless of payer type

Don’t assume needs are limited to specific populations.
48% of overall population report unmet social needs
44% of members under group commercial insurance

Number of unmet social needs
% of individuals

<table>
<thead>
<tr>
<th>Number of Unmet Social Needs</th>
<th>Overall Population</th>
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<tr>
<td>3+ unmet social needs</td>
<td>12</td>
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<tr>
<td>1 unmet social needs</td>
<td>24</td>
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<tr>
<td>0 unmet social needs</td>
<td>52</td>
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</table>

48% of respondents report at least one unmet social need

Number of unmet social needs by insurance coverage
% of individuals

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<tr>
<th>Insurance Coverage</th>
<th>Group</th>
<th>Individual</th>
<th>Medicare</th>
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<tr>
<td>3+ unmet social needs</td>
<td>24</td>
<td>20</td>
<td>24</td>
<td>19</td>
<td>29</td>
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<tr>
<td>2 unmet social needs</td>
<td>56</td>
<td>57</td>
<td>61</td>
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<tr>
<td>1 unmet social needs</td>
<td>56</td>
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<td>61</td>
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<td>0 unmet social needs</td>
<td>56</td>
<td>57</td>
<td>61</td>
<td>27</td>
<td>45</td>
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Source: 2019 McKinsey Consumer Health Insights Survey

NCQA Quality Accountability Programs

Measurement, Transparency, and Accountability

HEDIS

More than 203 million people—60% of the US population—are enrolled in health plans that report quality results using our Healthcare Effectiveness Data and Information Set. Americans receive better care and can lead healthier lives thanks to the accountability and benchmarking that HEDIS makes possible.

Health Plan Accreditation

Our industry-leading accreditation is a rigorous assessment of health plans’ structure and process, clinical quality and patient satisfaction. More than 173 million people are enrolled in NCQA-Accredited health plans.

Patient-Centered Medical Home (PCMH) Recognition

A medical home is not a place, but a way to organize primary care so it’s "the way patients want it to be." Since 2008 we have built the most widely used medical home model. More than 10,000 practice sites and 50,000 clinicians have earned the NCQA PCMH Recognition seal.
Bringing Transparency to Inequities: Early in the Journey

Comparing organizations on quality and equity requires large samples

Stratification by socioeconomic status
(Medicare only)

- Diabetes A1C
- Breast Cancer Screen
- Colorectal Cancer Screen
- All-Cause Readmission
- Hypoglycemia ED Visits*

Stratification by race & ethnicity

- HEDIS MY 2022: 5 Measures
- HEDIS MY 2023: 8 Measures

Evaluating race, ethnicity and language data

- Diversity of Race/Ethnicity
- Diversity of Language

* Approved by CPM 5/6/2022
Organizational Capabilities that Support Change: Lessons from PCMH

1. Laying the Foundation
   - Engaged Leadership

2. Building Relationships
   - Continuous and Team-Based Healing Relationships
   - Empanelment

3. Changing Care Delivery
   - Patient-Centered Interactions
   - Organized, Evidence-Based Care

4. Reducing Barriers to Care
   - Enhanced Access
   - Care Coordination

High-performing PCMH Practices Use Digital Capabilities

Practices grouped by approach to PCMH implementation

1A - Access During Office Hours†
1B - After-Hours Access†
1C - Electronic Access†
1D - Continuity
1E - Medical Home Responsibilities†
1F - Culturally and Linguistically Appropriate Services†
1G - The Practice Team
2A - Patient Information
2B - Clinical Data†
2C - Comprehensive Health Assessment
2D - Use Data for Population Management*†
3A - Implement Evidence-Based Guidelines†
3B - Identify High-Risk Patients†
3C - Care Management*†
3D - Medication Management†
3E - Use Electronic Prescribing†
4A - Support Self-Care Process*†
4B - Provide Referrals to Community Resources†
5A - Test Tracking and Follow-Up†
5B - Referral Tracking and Follow-Up†
5C - Coordinate With Facilities/Care Transitions*†
6A - Measure Performance†
6B - Measure Patient/Family Experience†
6C - Implement Continuous Quality Improvement*†
6D - Demonstrate Continuous Quality Improvement†
6E - Report Performance†
6F - Report Data Externally†
6G - The Practice Team
Low Performing
High Performing plus Electronic Access
High Performing
Quality Today – Separate and Disconnected

Cost and Burden of Implementation is Passed Through to Providers and Payers

Practice Guidelines
Guideline Text
Program Goals

Measurement
Measure Specifications in Paper Format, Manual Data Extraction, Audit and Certification

Data Collection, Transfer, Aggregation
Care Gap Reports, Clinical Decision Support, Analytics

High cost; manual; duplicative – funded by providers and payers

~$10B per year

Fragmented, narrative, Not digitally enabled

Variation; inconsistent validation

Retrospective, limited, not fully enabling QI
Quality Accountability and Improvement Tomorrow – NCQA’s Roadmap

- Accelerated, collaborative, agile knowledge engineering
- User groups, best practices, community enablement
- Consensus mechanisms

- Reduced audit burden
- More valid, trusted data sources
- Continuous timely insights
- Correct data problems at source

- Lower cost and increased breadth of distribution
- More quality use cases
- Better support for Value-Based Contracting at many levels of accountability

- Reporting Solutions
  - e.g., DAV; NLP

- Care Improvement Solutions

- Connect to Guidelines / CDS

- Digital Measures

- Collaboration & Tools
  - Digital Community

- Performance Solutions

- Dynamic content delivered via Digital Solutions
A Journey Towards Interoperability

1997-2009

Beginning
- 1997 Institute of Medicine Report urges EHR use to improve patient records
- 2004: National Coordinator for Health IT appointed
- 2009 HITECH Act: $540 million in incentives and technical assistance

2010 - 2019

Progress
- Meaningful Use contributes to 80% EHR adoption
- Creation of standards
- 2016 21st Century Cures Act: focus on transparency and access to electronic health information

2020

Regulation
- May 2020: ONC and CMS Final Rules intended to move the health care ecosystem towards interoperability

2021 and beyond

Transformation
Implementation of rules:
- Information blocking/patient access to data
- EHR certification updates
- Data exchange for providers, patients, payers
What are Digital Quality Measures (dQMs)?

Digital quality measures:

- Use a standards-based interoperability format
- Use machine-interpretable measure logic (e.g., Clinical Quality Language or CQL)
- Include a data dictionary/model (e.g., Fast Healthcare Interoperability Resources or FHIR)
- Incorporate data concepts/terms (e.g., value sets) required to execute the measure

- Easier deployment of measures in health IT systems
- Reduce interpretation, recoding, human error
- Standardized to ease use across the care continuum
Quality Infrastructure to Support Total Cost of Care Models

- Trusted, consensus-based evaluation standards and methods for evaluating the capabilities and care processes that teams and organizations use to achieve high quality care

- Measurement approaches to evaluate unmet social needs and barriers to access

- Standardized health data exchange to support novel digital quality and equity measures
Considerations for Nested vs. Carveout Specialty Care Episodes

Brian Bourbeau
Division Director, Practice Health
American Society of Clinical Oncology

September 22, 2022
# Oncologists Participation in Medicare

## ACO and Specialist Models

<table>
<thead>
<tr>
<th>Model / Track</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
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<tbody>
<tr>
<td>MSSP Participants (AAPM)</td>
<td>1,243</td>
<td>3,052</td>
<td>3,877</td>
<td>4,093</td>
<td>4,184</td>
<td>5,989</td>
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<tr>
<td>MSSP Participants (Not AAPM)</td>
<td>6,856</td>
<td>7,047</td>
<td>7,247</td>
<td>7,082</td>
<td>7,019</td>
<td>5,727</td>
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<td>1</td>
<td>2,146</td>
<td>1,940</td>
<td>1,886</td>
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<tr>
<td>OCM Participants (Not AAPM)</td>
<td>4,009</td>
<td>4,053</td>
<td>4,079</td>
<td>1,294</td>
<td>1,374</td>
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Gynecologic Oncology, Hematology / Oncology, Radiation Oncology, Surgical Oncology
Manuscript in writing.
## Cancer Care Journey – A Collection of Episodes

### Table: Cancer Care Episodes

<table>
<thead>
<tr>
<th>Screening</th>
<th>Diagnosis</th>
<th>Treatment</th>
<th>Survivorship</th>
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</thead>
<tbody>
<tr>
<td>PCP Driven</td>
<td>PCP/Specialist Driven</td>
<td>Specialist Driven</td>
<td>PCP/Specialist Driven</td>
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<tr>
<td>Low Intensity</td>
<td>High Intensity</td>
<td>High Intensity</td>
<td>Moderate Intensity</td>
</tr>
<tr>
<td>Routine Health</td>
<td>Acute</td>
<td>Acute</td>
<td>Chronic</td>
</tr>
<tr>
<td>Indefinite</td>
<td>Weeks to Months</td>
<td>30-90 days</td>
<td>Indefinite</td>
</tr>
<tr>
<td>Primary Care Medical Home</td>
<td><strong>Surgical</strong></td>
<td><strong>Radiation</strong></td>
<td><strong>Medical</strong>*</td>
</tr>
</tbody>
</table>

*Oncology Medical Home
# Nesting vs. Carveout

<table>
<thead>
<tr>
<th>Nested Episode</th>
<th>Carveout Episode</th>
<th>Coordinated Care</th>
</tr>
</thead>
<tbody>
<tr>
<td>Defined Duration</td>
<td>Indefinite Duration</td>
<td>Indefinite Duration</td>
</tr>
<tr>
<td>Predictable Financial Impact</td>
<td>Financial Impact Varies Within and Over Time</td>
<td>Costs Trends with Overall Patient Risk</td>
</tr>
<tr>
<td>Care Management Remains with Primary Care</td>
<td>Specialty Care Management</td>
<td>Ongoing Care Coordination between PCP and SCP</td>
</tr>
<tr>
<td>Opportunity to Reduce Data Collection, Measurement, and Reporting</td>
<td>Need for Distinct Data Collection, Measurement, and Reporting</td>
<td>Diabetes, Cancer Survivor</td>
</tr>
<tr>
<td>E.g., Joint Replacement, Radiation Oncology Model</td>
<td>E.g., Enhancing Oncology Model, End-Stage Renal</td>
<td></td>
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</tbody>
</table>

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Considerations for Nested Episodes

• Simplify payment methodology
  ▪ Bundled payments
  ▪ Remove duplicate discounts & performance payments/recoupments

• Reduce duplicate and conflicting quality measures
  ▪ E.g., if an ACO beneficiary receives radiation therapy, does CMS need both CAHPS for MIPS and CAHPS for RO?

• Reduce duplicate data reporting and other administrative burden
  ▪ E.g., Collection and reporting of sociodemographic data
Considerations for Carveout Episodes

• Select disease episodes that justify:
  ▪ Shift in responsible provider
    o Patient engagement, care management / navigation, data collection, health related social needs, cost of care
  ▪ Need for differing quality measures and performance scoring
  ▪ Need for additional demographic or disease data

• Build in care delivery requirements and measures focusing on “hand-offs” between PCP and SCP
Continuity of Comprehensive Care in the Patient-Centered Oncology Payment Model

• 24/7 access to provider; expanded in-person/virtual visit access
• Financial counseling services
• Missed visits / referrals follow-up
• Care team coordination
• Addressing psychosocial related health needs
• Symptom management
• Advance care planning
• Use of certified EHR technology
Hand-offs in the Patient-Centered Oncology Payment Model

• Primary Care to Specialty Care:
  ▪ Patient education on Oncology Medical Home
    o What services to expect
    o How to contact the care team
    o Responsibilities of the patient and provider
  ▪ Individualized treatment plan
    o Final diagnosis, goals, treatment, potential adverse effects, follow-up plan, home care management

• Ongoing Care Collaboration:
  ▪ Communication from SC to PC on patient status, treatment and referrals

• Specialty Care to Primary Care:
  ▪ Survivorship care plan
    o Treatment summary
    o Follow-up care: PC & SC
Phases of Care in the Patient-Centered Oncology Payment Model

• New patient

• Cancer treatment

• Active monitoring (survivorship)

Coordinated
Considerations for Coordinated Care

• Fee-for-service creates competitive / uncoordinated care management (e.g., one provider may bill transitional care management; first one to bill gets paid)

• Fee-for-service includes time thresholds for a provider or practice (e.g., 30 minutes for chronic care management)

• Population health models with care management fees should vary fees based on individual patient needs, rather than aggregate

• Population health models should encourage sharing of fees between PC and SC
Economics of an Accountable Care Model

Model Components
- Care management fees
- Shared savings/risk
- Quality incentives

Specialty Care Incentives:
- Shared care management fees for patients with chronic conditions
- Shared savings / risk with specified thresholds
- Shared quality incentives

Other Effects
- Market share gains
- Reduced leakage
- Foregone service utilization

- Preferred provider / center of excellence
- How does a health system led ACO and a specialty care provider treat the question of leakage?
- Beneficiary incentives to comply with referrals for consultation
Subject Matter Experts

- **Mark McClellan, MD, PhD**, Robert J. Margolis Professor of Business, Medicine, and Policy, and Founding Director, Duke-Margolis Center for Health Policy, Duke University
- **Joseph Francis, MD, MPH**, Executive Director, Analytics and Performance Integration, Office of Quality and Patient Safety, Veterans Health Administration
- **Kate Freeman, MPH**, Manager, Market Transformation, American Academy of Family Physicians
- **Nancy L. Keating, MD, MPH**, Professor of Health Care Policy, Department of Health Care Policy, Harvard Medical School; Professor of Medicine and Practicing General Internist, Brigham and Women's Hospital
- **Robert E. Mechanic, MBA**, Executive Director, Institute for Accountable Care; and Senior Fellow, Heller School of Social Policy and Management, Brandeis University
Specialty Care Engagement and the Future of Comprehensive Care and Payment Reforms

Mark McClellan, MD, PhD
Robert J. Margolis Professor of Business, Medicine, & Policy
Founding Director of the Duke-Margolis Center for Health Policy
September 20, 2022
CMS Strategic Commitment to Advance Comprehensive Care and Equity

CMS Strategic Aims

• All Medicare Part A/B beneficiaries will be in a care relationship with accountability for quality and total cost of care by 2030.
• The vast majority of Medicaid beneficiaries will be in a care relationship with accountability for quality and total cost of care by 2030.
• CMS will support system-wide health care reform for whole-person, accountable care
Some Key Challenges and Opportunities in Realizing 2030 Comprehensive Care Vision

- **Multipayer alignment**: increasing directional alignment to reduce burden and increase critical mass of support for comprehensive care models
  - Quality measures, equity data and measures, payment reform components, reliable and timely sharing of key data, technical support and learning collaboratives
  - Health Care Payment Learning and Action Network
  - Predictable pathway for Medicare participation in aligned multipayer initiatives

- Steps to address **structural barriers for underserved populations**
  - Social risk adjustment and complementary payment policies for comprehensive safety net care
  - Integration of equity-related measures and steps to address disparities

- Complementary reforms nested in population accountable care models to **engage specialists, increase coordination and alignment** between primary and specialist care providers, and **support and sustain reforms in specialty care pathways**
Specialist participation in APMs to date has been limited

While ~50% of all specialists (+266K) participated in Medicare Shared Savings Program in 2020, most specialists do not feel directly engaged or supported for achieving ACO goals

**Key Factors**

1. **Limited operational impact so far** resulting in many specialists appear to be unaware that they are part of an ACO
   - **Hospital-based ACOs**: Limited change in practice operations including physician compensation and reimbursement model
   - **Primary care-based ACOs**: Attempted savings and care improvements driven by selective referrals not from changing specialist compensation and supporting longitudinal coordinated-care models

2. **Misperception** that “ACOs are for primary care providers” from limited engagement and alignment with specialty care providers

https://www.ahajournals.org/doi/full/10.1161/CIRCOUTCOMES.118.005438
Specialty Care Is the Largest Component of Whole-Person Health Care

Specialist care is a key driver of cost and service utilization across the health care system.

Components of Total National Medical Expenditures

- Specialist Care
- Prescriptions
- Dental
- Primary Care
- Other

Key Takeaways

- More than 60% of all office visits are attributable to specialist care.
- Services account for more than 90% of professional expenses.
- Services result in $2T or 63% of all medical expenditures in the United States.

CMS Innovation Center has released its initial specialty care integration strategy

- Specialist engagement will help enhance care coordination with primary care, expand accountability for the quality and cost of care, and advance health equity by increasing access to high-value specialty care

- CMMI’s strategy to increase specialist participation involves:
  - Leveraging episode-based models nested within ACO models
  - Enhanced data sharing between primary and specialty care
  - Attribute accountability to specialists that assume primary responsibility of care
  - Integrating specialty care into primary care pathways
Health care from person perspective

Care Pathway or Care Journey with Primary, Specialty, and Primary-Specialty Care

- Prevention
- Diagnostic Services, Drugs, Non-Surgical Steps to Intercept or Slow Disease Progression
- Acute Medical Event or Major Procedure, Post-acute Care
- Maintenance Care, Follow-Up, Prevention, Procedure Revisions
- Supportive Care
- End of Life Care

Components of care pathway generally influenced by specialty care
Opportunities for Care Integration Supporting Comprehensive Musculoskeletal Care

Optimize:
- Mobility and exercise
- Lifestyle modification
- Diet control
- Chronic disease Mx

Integrate:
- Lifestyle modification inc Sleep hygiene
- Social support & unmet needs
- Behavioral health screening / therapies
- Self-management, structured exercise

Enhance:
- Shared decision-making
- Appropriate surgical utilization
- Surgical recovery
- (Less surgical professional fees (avg across population)

Maintain / Monitor:
- Longer remote follow-up
- Disease Progression
- Prevention
- Longer-term revisions

- Promote evidence-based guidelines and non-operative strategies across management continuum
- Reduce low-value interventions and unwarranted clinical variation musculoskeletal management
- Apply infrastructure payment incentives for care coordination and PRO-driven management including PRO-PMs

Prevention
Surgical episode
Post-acute Care
Maintenance Care

Diagnosis
Surgical Decision
Condition-based payment
Major procedure payment

Major procedure payment

Surgical Decision
Diagnosis
Small number of specialty conditions drive significant share of Medicare beneficiary disease burden and spending

**Important Considerations**

**Cardiology and Musculoskeletal**
- Many procedures of low/no value – better longitudinal patient management and accountability can encourage appropriateness

**Respiratory**
- Many acute hospitalizations that could be avoided with better patient management

**Cancer**
- Chemotherapy could be prescribed and administered more efficiently

**Dementia and other mental health conditions**
- Worsens with age, often poorly managed today

Source: Analysis by Signify Health
Significant Portion of Spending Occurs Outside of Episodes

Condition management is a substantial component of specialty spending, and potential driver of acute events and major procedures – but is mostly left out of current payment reforms for specialty care.

Optimizing base condition management enables opportunity to limit major procedures.

Orthopaedics:
- 51.2% Base Condition Management
- 10.4% Acute Events/Stays
- 11.8% Major Procedures
- 26.6% Minor Procedures

Cardiology:
- 32% Base Condition Management
- 18% Acute Events/Stays
- 18% Major Procedures
- 32% Minor Procedures

Respiratory medicine:
- 32% Base Condition Management
- 47% Acute Events/Stays
- 7% Major Procedures
- 14% Minor Procedures
Specialty-Focused Condition-Based Payment Models Nested in Population-Based Payment Models Can Support Patient Journey

Patient Journey

Screening/Prevention → Chronic Disease → Acute Medical Event → Major Procedure → Care Management

Payment Models

Specialty Condition Model

MSSP/Other ACO/MA TCOC Accountability

Diagnosis

Advanced illness (including end of life)
Next Steps for Comprehensive Specialty Payment Reform

<table>
<thead>
<tr>
<th>Transformation Strategy</th>
<th>Key Characteristics</th>
</tr>
</thead>
</table>
| Increased data and feedback | • Producing condition-level measures of quality and spending, which can be provided back to specialists and referring primary care clinicians  
• Implementing longitudinal quality measures into MIPS |
| Condition-based payment models for specialty care | • Nest longitudinal, condition-based models between DRG-based bundles and TCOC payment reforms, starting with top 3-5 conditions (MSK, CV, oncology, neurodegenerative disease, respiratory…)  
• Provide guidance for voluntary participation by physician group led ACOs, with mandatory participation by hospital led ACOs |
| Mandatory bundles for major procedures | • Transition all beneficiaries to mandatory 30-day bundled episode payments for major procedures and acute medical admissions |
| Modify ACO models to better engage specialists | • Increase non-financial incentives for specialist engagement, such as reduced reporting requirements or data/feedback on quality measures  
• Shift to quality measures that can better capture specialist contribution to important outcomes for common conditions, such as PROs |
VETERANS HEALTH ADMINISTRATION

Population-Based Total Cost of Care Models
Insights from VHA

Presentation for:  Physician-focused Payment Model Technical Advisory Committee
Presented by:  Joseph Francis MD, MPH  Analytics & Performance Integration
Date of Briefing:  September 20, 2022
**VHA Overview**

VHA operates the *nation’s largest* integrated health care system and is one of the largest health care employers in the world.

**371,000+ Total VHA Employees**

- **100,000+ Veteran Employees**
- **232,000+ Clinical Employees**

**Four Statutory Missions:**

- Care Delivery
- Education
- Research
- Emergency Response
Our Healthcare System

- Organized by geographic region - 18 Veteran Integrated Service Networks (VISNs)
- 1,303 VA Healthcare Facilities including:
  - 171 VA Medical Centers (VAMCs)
  - 1,125 VA Outpatient Sites
- 318 Vet Centers (Readjustment Counseling)
- 136 Community Living Centers (Nursing Homes)
- 116 Residential Rehabilitation Treatment Programs
- 51 Mobile Clinics – each connected to a medical centers

Source: VHA Quarterly Executive Summary Q4
VHA Mission – Characteristics supporting Value-driven Care

- Global Budget
- Salaried Providers (Base + Market Pay + Performance Pay)
- Foundation of Strong Team-Based Primary Care (Team Attribution)
- National Prescription Drug Formulary
- Expanded Access to Community Care with Care Coordination
Risk-adjusted capitation model designed to equitably distribute VHA’s Medical Care budget across 18 VHA Networks

28 distinct VERA price groups based on their medical treatments and service-connection.

90% of VERA is driven by clinical diagnoses and care practices.

VERA allocates an additional 1% to address high cost outlier patients.

VERA applies a geographic adjustment to the allocations

Additional adjustments for Research and Education

Annual updates are made to the allocation model in consultation with key stakeholders to ensure equity and responsiveness to evolving trends in medical care.
Near Real-Time* Electronic Quality Measurement

*updated weekly
Variation in Efficiency

FY2022 SFA Overall
VISN Observed to Expected (OE) Values

FY2022 SFA Overall
Facility Observed to Expected (OE) Values

Quintile
1-Most Efficient to 5-Least Efficient

1 2 3 4 5
Cost Efficiency and Quality of Patient Care Go Hand in Hand\textsuperscript{1}
Efficiency Opportunity Grid

-- Identify Areas of Inefficiency for Improvement

• Multivariate regression is applied to each area of high cost & high volume
• An O/E ratio is derived for each hospital on each outcome modeled by controlling for confounding factors such as patient characteristics (e.g., case-mix) and hospital characteristics (e.g., teaching status)
• Set targets for improvement
Most prevalent low-value service: PSA screening in men ≥ 75 y

Most costly low-value service: Imaging for nonspecific back pain

One-third of these services were delivered in the community by non-VA providers

Overall count of low-value care was two-thirds that of Medicare beneficiaries, despite the study including 3 additional services than Schwartz et al 2014.

Work is ongoing to incorporate measures of low-value care into real-time electronic reporting systems

Radomski et al, 2022


ADDITIONAL BACKGROUND
Stochastic Frontier Analysis (SFA)
Analytical Tool Assessing Overall Cost Efficiency

- SFA, like traditional multivariate regression models, levels the playing field by controlling for confounding factors (e.g., case-mix, hospital and facility characteristics)
- SFA, unlike traditional multivariate regression models, is designed to separate inefficiency from random factors that are not under the management’s control
- SFA, unlike DEA (data envelopment analysis), produces a practical frontier that hospitals can reach
- SFA measures the efficiency of each hospital against the frontier (best practice)
- SFA measures total efficiency with two models – clinical and administrative
Incentives for Primary Care in Moving Across the Risk Continuum

PTAC September Public Meeting

Kate Freeman, MPH
Manager, Market Transformation
American Academy of Family Physicians
Who is the AAFP?

- National association of family physicians representing 127,600 family physicians, students, and residents
- The largest single specialty medical society in the US
- The only medical society devoted solely to primary care
- Diverse membership: various ages, ethnicities, races, practice types and geographies, inclusive of urban & rural communities
- Non-profit organization (501C-6) with a philanthropic arm, the AAFP Foundation (501C-3)
Primary Care as a Common Good

Implementing High-Quality Primary Care: Rebuilding the Foundation of Health Care

...primary care is the only health care component where an increased supply is associated with better population health and more equitable outcomes. For this reason, primary care is a common good, making the strength and quality of the country’s primary care services a public concern.

- Implementing High Quality Primary Care Report, May 2021

https://www.nationalacademies.org/our-work/implementing-high-quality-primary-care#sectionWebFriendly
Primary Care Payment Principles

1. Increased investment through predictable, prospective revenue streams aligned across payers
2. Knowing who is accountable for which patient through prioritizing patient-physician relationships
3. Risk adjusted for demographic, clinical, and social determinants of health
4. Financial benchmarks that reward both improvement and sustained performance
5. Performance measures that focus on process and outcomes that matter most to patients and have the greatest impact on health
6. Readily available, clinically relevant, and actionable patient information
Risk, Risk Baby
Where Should Accountability Lie?

- Different Portals and Reports
- Different Measures of Success
- Administrative Noise
Most primary care compensation arrangements still largely based on volume

Health Equity and Risk Considerations

Ensure physicians are not penalized based on the differences in the characteristics of their patients by:

- Incorporate equity at the onset of payment design
- More emphasis on improving patient outcomes and less on reducing TCOC
- Robust risk adjustment, including demographic, clinical, and social determinants of health
Integration, Coordination, & Accountability
What’s Integrated & What’s Coordinated

Primary Care Team
  Behavioral Health
  Pharmacy
  Social Work
  Nutrition

Cardiology

Oncology

Everyone else!
Leaning in to the QB Analogy
Incentivizing SDOH Screening and Referral
Incentivizing SDOH Screening & Referral: A Fractured Reality

1. FFS
2. Risk-adjusted payments
3. Community-based solutions
A Two-Pronged Approach

Payment + Community Infrastructure = Increased Screenings & Referrals

Improved Health and Equity
How about a big finish to summarize key themes?

- Primary care as a common good is best resourced by increased investment through predictable prospective payments.
- Changing the payment structure alone is not enough!
  - Need to re-envision physician employment contracts to reflect the incentives in payment methodologies.
  - Payers need to understand that primary care physicians’ first priority as “quarterback” is to their patients and coordinating the “playbook” at the regional level can pay off.
- Accepting accountability for risk is about how they are equipped for success as much as the size of the practice or the number of patients.
- Health and social care systems must be adequately funded and connected to achieve the vision of health equity for all.
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No part of the materials/content may be copied, duplicated, distributed or retransmitted in any form or medium without the prior permission of the applicable copyright owner.
Population-Based TCOC Models and Specialty Care: Lessons from Oncology Care

Nancy L. Keating, MD, MPH
Professor of Health Care Policy
Department of Health Care Policy, Harvard Medical School
PTAC Public Meeting
September 20, 2022
Disclosures

• I am Clinical Lead of the CMS Oncology Care Model (OCM) Evaluation Team. Any mention of OCM reflects work that has been published in the OCM Evaluation Team Annual Reports. My comments and opinions are my own and not reflective of those of CMS.
Accountable Care Organizations & Cancer

• Limited/no effect of ACOs on overall spending, care at the end of life, or surgical care quality for patients with cancer

DID impact estimate: $11 (95% CI -$275, $297)

Lam et al, JCO 2018
# Oncology Care Disease Spectrum

<table>
<thead>
<tr>
<th>Screening</th>
<th>Diagnosis/ Evaluation</th>
<th>Primary Treatment</th>
<th>Chronic Treatment/ Surveillance</th>
<th>Recurrence/ Resume Treatment</th>
<th>End-of-Life Care</th>
</tr>
</thead>
</table>

## Key Clinicians by Phase of Disease

<table>
<thead>
<tr>
<th>Phase of Disease</th>
<th>Primary care</th>
<th>Various specialists</th>
<th>Surgeon</th>
<th>Medical oncologist</th>
<th>Medical oncologist</th>
<th>Medical oncologist</th>
<th>Medical oncologist</th>
<th>Medical oncologist</th>
</tr>
</thead>
<tbody>
<tr>
<td>Screening</td>
<td>Primary care</td>
<td>Various specialists</td>
<td>Surgeon</td>
<td>Medical oncologist</td>
<td>Primary care</td>
<td>+/- Surgeon</td>
<td>+/- Rad onc</td>
<td>+/- others</td>
</tr>
<tr>
<td>Diagnosis/ Evaluation</td>
<td>Primary care</td>
<td>Various specialists</td>
<td>Surgeon</td>
<td>Medical oncologist</td>
<td>Primary care</td>
<td>+/- Surgeon</td>
<td>+/- Rad onc</td>
<td>+/- others</td>
</tr>
<tr>
<td>Primary Treatment</td>
<td>Surgeon</td>
<td>Medical oncologist</td>
<td>Radiation oncologist</td>
<td>+/- Surgeon</td>
<td>+/- Rad onc</td>
<td>+/- others</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chronic Treatment/ Surveillance</td>
<td>Medical oncologist</td>
<td>Primary care</td>
<td>+/- Surgeon</td>
<td>+/- Rad onc</td>
<td>+/- others</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Recurrence/ Resume Treatment</td>
<td>Medical oncologist</td>
<td>Primary care</td>
<td>+/- Surgeon</td>
<td>+/- Rad onc</td>
<td>+/- others</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>End-of-Life Care</td>
<td>Medical oncologist</td>
<td>Primary care</td>
<td>+/- Surgeon</td>
<td>+/- Rad onc</td>
<td>+/- others</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Receipt of Multimodality Care is Infrequently from the Same Practice

Among patients who received more than one treatment modality (surgery, chemotherapy, radiation), % who received all modalities from the same practice

Gondi et al, Am J Man Care, 2019
Can ACOs Select High-Value Oncology Practices?

Number of Practices Providing Oncology Care by Hospital Referral Region

Landon et al, in preparation
Lessons from Episode Models:
CMS Oncology Care Model

201 practices and 10 payers

716,992 patient episodes initiated through 2019

Source: Centers for Medicare & Medicaid Services
CMS Oncology Care Model Payments

$\$: One or two-sided risk for spending & quality goals

Oncology practice

Selected patients initiating chemotherapy

Selected patients initiating chemotherapy

All other patients & types of care

All other patients

Fee-for-service payments

Fee-for-service payments PLUS $160/patient per month for 6-month episode
Impact: Total Episode Payments (excluding monthly payments)

Keating et al, JAMA 2021
## Impact: Total Episode Payments (excluding MEOS)

<table>
<thead>
<tr>
<th></th>
<th>OCM</th>
<th>Comparison</th>
<th>Impact Estimate</th>
<th>90% CI</th>
<th>% change</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Baseline</td>
<td>Intervention</td>
<td>Baseline</td>
<td>Intervention</td>
<td>DiD</td>
</tr>
<tr>
<td><strong>Overall</strong></td>
<td>$28,681</td>
<td>$33,211</td>
<td>$28,421</td>
<td>$33,249</td>
<td>-$297**</td>
</tr>
<tr>
<td><strong>Higher-risk episodes</strong></td>
<td>$39,934</td>
<td>$46,697</td>
<td>$39,441</td>
<td>$46,707</td>
<td>-$503***</td>
</tr>
<tr>
<td><strong>Lower-risk episodes</strong></td>
<td>$7,226</td>
<td>$7,510</td>
<td>$7,329</td>
<td>$7,461</td>
<td>$151**</td>
</tr>
</tbody>
</table>

*p<0.10, **p<0.05, and ***p<0.01

Keating et al, JAMA 2021
Total Episode Payment Savings Focused Among 4 Cancer Type

Keating et al, JAMA 2021
# OCM Quality Measures

<table>
<thead>
<tr>
<th>OCM Measure Number</th>
<th>Measure Name</th>
<th>Measure Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>OCM-2</td>
<td>Risk-adjusted proportion of patients with all-cause emergency department visits or observation stays that did not result in a hospital admission within the 6-month episode</td>
<td>Claims</td>
</tr>
<tr>
<td>OCM-3</td>
<td>Proportion of patients that died who were admitted to hospice for 3 days or more</td>
<td>Claims</td>
</tr>
<tr>
<td>OCM-4a</td>
<td>Oncology: Medical and Radiation – Pain Intensity Quantified (MIPS 143, NQF 0384)</td>
<td>Practice Reported</td>
</tr>
<tr>
<td>OCM-4b</td>
<td>Oncology: Medical and Radiation – Plan of Care for Pain (MIPS 144, NQF 0383)</td>
<td>Practice Reported</td>
</tr>
<tr>
<td>OCM-5</td>
<td>Preventive Care and Screening: Screening for Depression and Follow-Up Plan (CMS 2v8.1, NQF 0418)</td>
<td>Practice Reported</td>
</tr>
<tr>
<td>OCM-6</td>
<td>Patient-Reported Experience of Care</td>
<td>CMS-Acquired Data</td>
</tr>
</tbody>
</table>

OCM Overview. CMS OCM Website
Did Quality Improve for OCM Participants?

3 OCM Performance Measures that Could be Assessed in OCM and Comparison Practices

<table>
<thead>
<tr>
<th></th>
<th>OCM</th>
<th>Comparison</th>
<th>Impact Estimate</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Baseline</td>
<td>Intervention</td>
<td>Baseline</td>
</tr>
<tr>
<td>% ED visit</td>
<td>23.6%</td>
<td>23.5%</td>
<td>24.3%</td>
</tr>
<tr>
<td>Hospice enrollment ≥ 3 d before death</td>
<td>58.5%</td>
<td>59.8%</td>
<td>59.8%</td>
</tr>
<tr>
<td>Overall rating of care</td>
<td>9.3</td>
<td>9.3</td>
<td>9.3</td>
</tr>
</tbody>
</table>

Keating et al, JAMA 2021
• Voluntary model

• Patients with 7 cancer types receiving systemic therapy
  – Breast cancer, chronic leukemia, colorectal cancer, lung cancer, multiple myeloma, prostate cancer

• Quality
  – Care transformation through redesign activities
  – Quality measures and reporting
  – Advancing health equity

https://innovation.cms.gov/innovation-models/enhancing-oncology-model
Radiation Oncology Model

• Prospective payment for 90-day episodes of care for 15 cancer types in randomly selected areas
• Congress delayed model start
Challenges to Alternative Payment Models in Oncology

• Cancer care is quite heterogeneous—depends on cancer type, stage, and tumor characteristics; also phase of illness
  – Current risk adjustment limited ability to account for differences in case mix
• Patients receive cancer treatment from surgeons, radiation oncologists, medical oncologists
• Quality measurement in oncology care is early in development
How Could Oncology Care be Integrated into ACOs?

• Help ACOs identify high quality/low-spending practices with whom to contract
  – Choice of practices may differ depending on cancer type and stage and treatments needed
  – But some areas have very few choices
  – Substantial challenges measuring quality given heterogeneity of disease, small numbers of patients
Also Challenges to Episode Models

- Episode models need to focus on specific phases of disease and types of care (e.g., chemotherapy, radiation)
  - Even then, substantial heterogeneity
- Increasingly narrow focus omits many patients and much care delivered (e.g., survivorship care, end-of-life care)
  - Such care may be best shared with PCPs
- Complexities of model overlap
Pressing Needs

• Better data on quality and spending
• Testing of a variety of strategies for episode/carve out models
  – Mandatory models particularly informative
• Testing of models for shared care
Oncologists’ Reports on Who Manages Surveillance Care for Patients Following Primary Treatment

Klabunde et al, Eur J Cancer 2017

- Routine screening for other cancers:
  - Oncologist leads: 22%
  - Oncologist co-manages: 31%
  - PCP leads: 46%

- New depression:
  - Oncologist leads: 13%
  - Oncologist co-manages: 51%
  - PCP leads: 35%

- Smoking:
  - Oncologist leads: 23%
  - Oncologist co-manages: 57%
  - PCP leads: 18%

- Persistent cough (patient w/ lung cancer):
  - Oncologist leads: 64%
  - Oncologist co-manages: 32%
  - PCP leads: 4%
Acknowledgements:

CMS Oncology Care Model Evaluation Team

Funding: CMS contract HHSM-500-2014-00026I

Other research presented funded by AHRQ R01HS026498, NCI CanCORS Study, and Arnold Ventures.
Strategies for Improving Alignment Between PCPs and Specialists in ACOs

Prepared for ASPE/PTAC

Robert Mechanic, MBA

September 20, 2022
Summary

• Specialist alignment is high priority for ACOs, but current level of alignment is generally low

• Progress affected by organizational complexity, limited interoperability, prevailing FFS incentives and culture

• Lack of data and metrics to evaluate specialist performance is a major barrier

• Specialist financial incentives on the margin are unlikely to be key drivers of change
Institute for Accountable Care

Independent 501(c)(3) formed to conduct research to inform policy and promote best practices in accountable care

Policy Analysis

Custom Data Analytics

Research & Collaboratives

Medicare Data
100% of FFS Claims Through Q2 2022
• Part A, B, D claims
• MDS assessments
• ACO provider file
• ACO beneficiary file
• MD-PPAS
• MA encounters (19)
ACOs Combine Multiple Independent Provider Groups

Mean Number of ACO Provider Groups (TINs) by Decile

Average Number of Physician Groups per Medicare ACO = 34

Source: MSSP 2020 Public Use File.
Limited Interoperability Affects Specialist Alignment

**TABLE 2. Data Integration and Quality Measure Reporting Capabilities by Number of EHR Systems Within MSSP ACOs**

<table>
<thead>
<tr>
<th>Capabilities</th>
<th>1 EHR (n = 14)</th>
<th>2-5 EHRs (n = 23)</th>
<th>6-15 EHRs (n = 66)</th>
<th>≥ 16 EHRs (n = 60)</th>
<th>P&lt;sup&gt;a&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACOs in each EHR category</td>
<td>9%</td>
<td>14%</td>
<td>40%</td>
<td>37%</td>
<td></td>
</tr>
<tr>
<td>ACO has infrastructure to aggregate</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EHR data, n [%]</td>
<td>11 (79%)</td>
<td>9 (39%)</td>
<td>10 (15%)</td>
<td>8 (13%)</td>
<td>&lt;.01</td>
</tr>
</tbody>
</table>

Source: Perloff and Sobul, Use of Electronic Health Record Systems in ACOs. American Journal of Managed Care, January 18, 2022.
Grouping ACOs for Analysis of Out-of-Network Care

<table>
<thead>
<tr>
<th>ACO Type</th>
<th>Number</th>
<th>Percent PCP MDs in ACO</th>
<th>Percent w/Hospital</th>
<th>Average #Benes</th>
<th>Percent in AAPM</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. PCP Focused</td>
<td>130</td>
<td>67 - 100%</td>
<td>5%</td>
<td>11,383</td>
<td>35%</td>
</tr>
<tr>
<td>2. PCP Oriented</td>
<td>60</td>
<td>50 – 66%</td>
<td>30%</td>
<td>16,403</td>
<td>18%</td>
</tr>
<tr>
<td>4. Specialist Oriented</td>
<td>177</td>
<td>34 – 49%</td>
<td>69%</td>
<td>24,379</td>
<td>25%</td>
</tr>
<tr>
<td>4. Specialist Focused</td>
<td>157</td>
<td>0 – 33%</td>
<td>76%</td>
<td>24,379</td>
<td>27%</td>
</tr>
</tbody>
</table>

Source: 2019 MSSP Public Use File.
Proportion of ACO Beneficiary Care Provided by ACO Physicians

Based on Medicare Paid Amounts: Excludes Non-ACO Physicians in CIN

Source: Institute for Accountable Care analysis of 2019 Medicare Claims (100% file)
Proportion of ACO Beneficiary Care Provided by ACO Specialists

Distribution of **Medical Specialist** Services Provided In-Network* by ACO Category (N=514)

* Definition excludes specialists in health system CIN who do not participate in Medicare ACO

Source: Institute for Accountable Care analysis of 2019 Medicare Claims (100% file)
NAACOS/IAC Survey of Specialist Engagement

• Surveyed subset of NAACOS members in April 2022
• Responses from 64 ACOs (45% response rate)
• Respondents tended to be large and a majority employ at least 60% of ACO specialists
ACO Activities to Improve Specialist Alignment

Percent of ACOs Reporting Activities by Level of Activity

<table>
<thead>
<tr>
<th>Type of Activity</th>
<th>Major</th>
<th>Minor</th>
<th>No Activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Convene Specialists to Develop Care Pathways</td>
<td>34%</td>
<td>37%</td>
<td>29%</td>
</tr>
<tr>
<td>Give Specialists Unblinded Performance Reports</td>
<td>12%</td>
<td>44%</td>
<td>44%</td>
</tr>
<tr>
<td>Direct Referrals to High Performing Specialists</td>
<td>19%</td>
<td>41%</td>
<td>41%</td>
</tr>
<tr>
<td>Enter Bundled Payment Contracts</td>
<td>17%</td>
<td>25%</td>
<td>58%</td>
</tr>
</tbody>
</table>

Source: Self-reported survey data from 64 ACOs.
Moderate Use of Financial Incentives to Reward Specialists

Percent of ACOs With This Type of Incentive Program (N=64)

Source: Self-reported survey data from 63 ACOs.
Barriers to Specialist Engagement Reported

1. Lack of data or metrics to evaluate specialist performance (especially quality)
2. Dominant fee-for-service incentives driving specialist behavior
3. Insufficient bandwidth in ACO and among specialist groups to take on engagement efforts
4. Specialist unwillingness to engage
5. Uncertainty about structuring financial incentives given lack of data (also concern about diluting shared savings incentives for PCPs)
Level of Alignment between the ACO and the Health System’s Specialty and Hospital Services?
ACO Strategies

- Educating specialists on ACO goals
- Using episodes to measure specialist resource use
- Surveying PCPs on specialist performance (service level)
- Structuring opportunities for PCP-Specialist collaboration
  - Build PCP expertise in complex patient management
  - Referral “hoops” to force conversations and reduce unnecessary referrals
- Directing referrals to preferred specialists (including specialist tiering models)