

Overview of PTAC's Proposal Submission Instructions

Revised as of April 2, 2021

Please refer to the [Proposal Submission Instructions](#) for additional information regarding submitting proposals to PTAC.

Table of Contents

- [Overview](#)..... 3
- [How to Submit a Proposal to PTAC](#)..... 8
- [How PTAC Evaluates Submitted Proposals](#)..... 14
- [Preliminary Review of the Proposed Model](#)..... 18
- [Full Committee Deliberation on the Proposal](#)..... 22

Overview

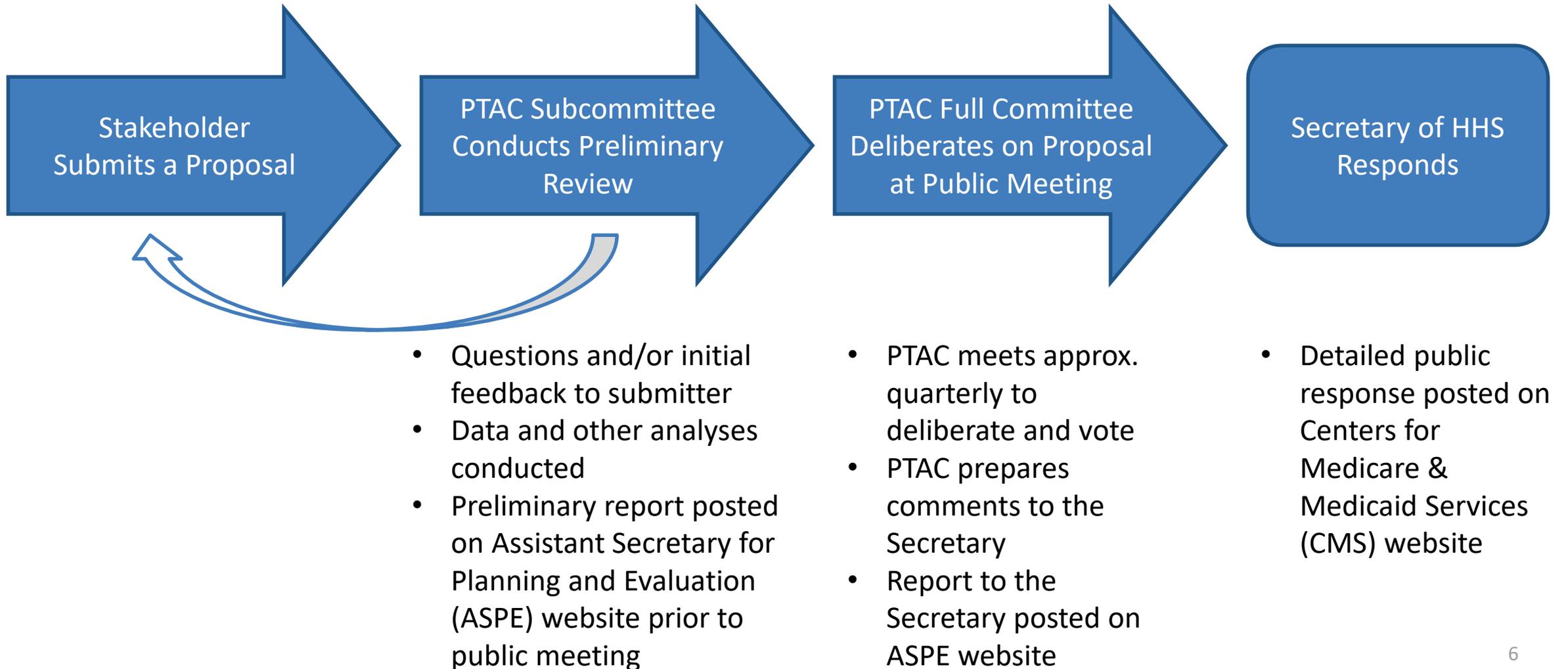
Introduction

- The Physician-Focused Payment Model Technical Advisory Committee (PTAC) was created under the Medicare Access and CHIP Reauthorization Act of 2015 (MACRA) as a means to:
 - Solicit (and obtain expert review of) proposals from individuals and stakeholder entities for new Medicare physician-focused payment models (PFPMs)
 - Provide expert comments and recommendations on these proposals to the Secretary of Health and Human Services (HHS; “the Secretary”)
- Additionally, PTAC seeks to ensure that stakeholders have a forum for conveying their ideas on how to deliver higher-value care.

Introduction, cont.

- PTAC's proposal review process involves evaluating stakeholder-submitted proposals based on the 10 criteria set forth by the Secretary.
- PTAC may also extend its expert opinion to further inform the Secretary about certain issues or factors that a given proposal raises and/or identify alternative approaches relating to the proposed model.
- The [Proposal Submission Instructions](#) describe the process for submitting proposals for new PFPs to PTAC, and how best to craft these proposals to help ensure a timely and effective review.

Overview of PTAC Proposal Submission and Review Process



Updates as of April 2021

- Consistent with PTAC's Vision Statement available on the [ASPE PTAC website](#), PTAC has updated the [Proposal Submission Instructions](#) to enhance stakeholders' ability to submit innovative PFPM proposals by:
 - Developing an additional track for proposal review to provide additional flexibility for stakeholders who may not have resources to fully address all of the PTAC review criteria, but who raise important care delivery, payment, or policy issues
 - Publishing a *Common Alternative Payment Model (APM) Approaches: Reference Guide* to assist stakeholders when designing proposed payment models; this guide is posted on the [Resources](#) page of the ASPE PTAC website.

How to Submit a Proposal to PTAC

Who May Submit a Proposal?

- Any individual or organization may submit a proposal.
- There is no limit on the number of proposals that a stakeholder may submit.
- In the event that a stakeholder is resubmitting a proposal that was previously submitted to PTAC, the proposal should include a brief description of up to one page specifying the changes that have been made. Please refer to the [Proposal Submission Instructions](#) for information regarding submitting multiple proposals.

When a Proposal May Be Submitted

- PTAC accepts proposals at any time but requests that stakeholders first submit a nonbinding letter of intent (LOI) at least 30 calendar days in advance of submitting a proposal.
 - After the 30-day period, stakeholders may submit the corresponding proposal at any time; submissions will be accepted on an ongoing basis.
- If a proposal is not received within six months of the LOI, the LOI will be considered “expired.”
 - If an LOI has expired, submitters can submit a new LOI, which can have the same content as an expired LOI.

How to Send a Proposal to PTAC

- Proposals must be submitted to PTAC via email at PTAC@hhs.gov in either PDF or Microsoft (MS) Word format.
 - Additional information in MS Excel or PDF format may also accompany submissions.
 - For details on what to include when emailing a proposal, see the [Proposal Submission Instructions](#).

How to Describe Your Proposal

- Submitters may organize and present their proposals in any manner they believe is most clear, concise, and effective.
- PTAC believes that the most effective proposals describe information such as:
 - The care delivery and/or payment problem(s) the proposal aims to address, and if applicable, why they can't be fixed under existing Medicare policies and procedures
 - The proposed care delivery and payment model described in as much detail as possible
 - Anticipated effects of the proposed model from the perspective of the beneficiary
 - How the proposal will satisfy each of the Secretary's 10 criteria for PFPs
- Please refer to the [Proposal Submission Instructions](#) for additional information regarding how to describe your proposal.

Administrative Requirements for Proposals

- Regardless of how a submitter chooses to organize a proposal, all proposals must:
 - Include a one-page transmittal letter from the submitter
 - Include a cover page
 - Include an abstract and table of contents
 - Adhere to prescribed formatting for the main body of the proposal
 - Use appendices as needed
- The main body of the proposal is not to exceed 25 pages, excluding any citations and appendices.
- If resubmitting a proposal, include a brief summary specifying the changes that have been made.

How PTAC Evaluates Submitted Proposals

Secretary's 10 Criteria for PFPs

- PTAC evaluates submitted proposals using 10 criteria for PFPs established by the Secretary in regulations:
 1. Scope (High Priority)
 2. Quality and Cost (High Priority)
 3. Payment Methodology (High Priority)
 4. Value over Volume
 5. Flexibility
 6. Ability to Be Evaluated
 7. Integration and Care Coordination
 8. Patient Choice
 9. Patient Safety
 10. Health Information Technology

Information Considered in PTAC's Evaluation Process

- PTAC conducts its evaluations by reviewing information submitted with each proposal.
- PTAC also considers additional information from various sources, such as clinical consultants, subject matter experts, literature reviews, and/or data analyses.
- To assist all submitters in putting forth their best evidence about how their proposal will satisfy the Secretary's criteria, the [Proposal Submission Instructions](#) include examples of information that could be included in a description of a proposed model.
- PTAC recognizes that there are varying degrees of resources available to stakeholders who seek to develop and submit a PFPM proposal. PTAC assesses proposals holistically and does not require proposals to be flawless in every respect to merit evaluation by PTAC.

Two-Track Process for Proposal Review

- PTAC recognizes that stakeholders who develop and submit a PFPM proposal have varying degrees of resources available, which can influence their ability to address certain criteria in detail (most notably, payment methodology). Therefore, stakeholders may submit proposals for consideration in one of two tracks:
- **Track 1** refers to the standard PTAC proposal review process, in which PTAC votes on both the extent to which the proposal meets each of the Secretary's 10 criteria as well as on an overall recommendation to the Secretary regarding the proposal.
 - Track 1 is most appropriate for proposals that include most or all of the information elements that PTAC believes are essential for submitted proposals to address for each of the 10 criteria.
- **Track 2** refers to a process in which the full Committee will not vote on an overall recommendation regarding the proposal because there is insufficient information for PTAC to be able to fully and comprehensively deliberate on the proposal.
 - Track 2 is most appropriate for proposals that may raise important care delivery, payment, or policy issues, but may have varying amounts of resources available, which can affect their ability to address certain criteria in detail.

Preliminary Review of the Proposed Model

After a Proposal Is Submitted

- When a proposal is submitted, ASPE staff conduct an initial administrative review of the proposal, and notify the submitter about the outcome of this assessment.
- Once a submitted proposal is found to have met the administrative requirements, it is posted in its entirety on the [ASPE PTAC website](#) and is open for public comment for three weeks.
- After the public comment period closes, the submitted comments are compiled by ASPE PTAC staff, sent to the PTAC members for consideration during the evaluation of the proposal, and posted on the [ASPE PTAC website](#).

Preliminary Review of the Proposed Model

- PTAC's Chair and Vice Chair will appoint a Preliminary Review Team (PRT), typically consisting of three PTAC members (at least one of whom is a physician).
- The PRT conducts a preliminary evaluation of the proposal and writes a report for the full PTAC to use in its review and public deliberation on the submitted proposal.
- The PRT will begin by conducting an initial assessment of the proposal.
 - The PRT will propose a track for the review of the proposal based on its initial assessment of the proposal.
 - For resubmitted proposals, the PRT will also review the submitter's brief description specifying the changes that have been made to the proposal.
- ASPE staff will notify the submitter about the findings from the PRT's initial assessment of the proposal, and the submitter will have an opportunity to respond.

Preliminary Review of the Proposed Model, cont.

- A PRT may identify the need to obtain additional information to better understand the proposed model.
 - If the PRT determines that additional information is needed from the submitter to better understand the proposed model, ASPE staff will contact the submitter.
 - The PRT may also seek additional information from clinical consultants, subject matter experts, literature reviews, and/or data analyses.
- Using the proposal, all additional information or analyses gathered, and any public comments received, the PRT will evaluate the proposal and determine whether it believes the proposal meets the Secretary's 10 criteria on [slide 15](#).
- The PRT may also provide initial feedback to the submitter on the proposal. Additionally, the submitter may withdraw, revise, and resubmit the proposal at any time.
- After completing its review, the PRT summarizes its review and recommendations in a written report to the full Committee, known as the PRT Report.
 - The PRT Report and additional information gathered by the PRT are typically posted to the [ASPE PTAC website](#) approximately four weeks prior to the public meeting at which the full PTAC will deliberate on the proposal. Submitters may provide a written response to the PRT Report.

Full Committee Deliberation on the Proposal

Full Committee Deliberation on the Proposal

- All PTAC deliberations on submitted proposals take place at public meetings, in compliance with the Federal Advisory Committee Act.
 - PTAC holds these public meetings quarterly—typically in March, June, September, and December.
 - ASPE PTAC staff will contact submitters when their proposal is expected to be deliberated and voted on.
- At the PTAC public meeting, the PRT will present its findings to the full Committee on the extent to which the proposal meets the Secretary’s criteria.
- Submitters have the option of attending the public meeting in person or remotely. At the public meeting, submitters will have the opportunity to make a public statement to PTAC for up to 10 minutes, and respond to any questions from Committee members.
- The Committee will then hear any comments about the proposal from the public.
- After this process, PTAC members will deliberate and score the proposal on each criterion established by the Secretary.

Full Committee Deliberation on the Proposal, cont.

- After the Committee scores the proposal on each criterion, where applicable, PTAC members will also vote to place the proposal into one of the following recommendation categories:
- **Track 1**
 - **Recommend Full Proposal:** Proposal substantially meets the Secretary's criteria for PFPMs. PTAC recommends implementing proposal as a payment model as described in PTAC's comments.
 - **Recommended Components:** Proposal includes attributes and/or components for attention by the Secretary as described by PTAC's comments.
 - **Not Recommended**
- **Track 2**
 - The full Committee will not vote on an overall recommendation for Track 2 proposals because there is insufficient information for PTAC to be able to fully and comprehensively deliberate on the proposal.

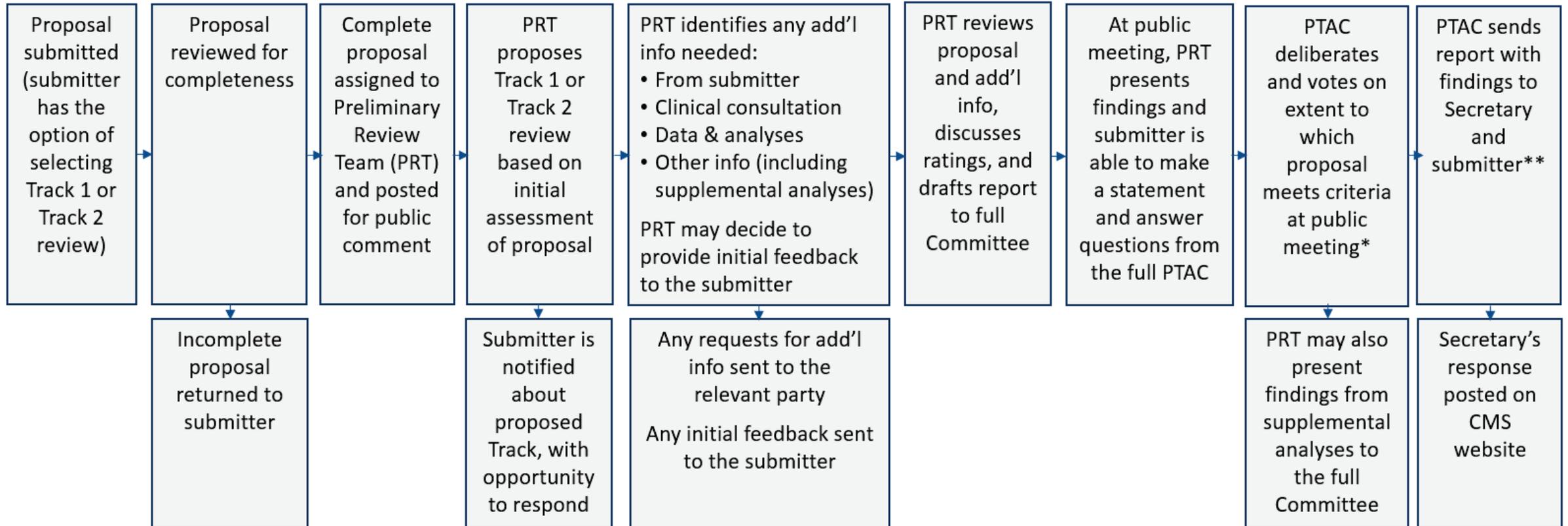
Report to the Secretary of HHS

- After the voting and deliberation portion of the meeting, PTAC will decide on topics to highlight in the report to the Secretary.
- ASPE PTAC staff, in consultation with the full PTAC, will then draft the report, reflecting the Committee's findings; the voting results regarding the extent to which the proposal meets the Secretary's criteria; and, for Track 1 proposals, the rationale for the vote on the overall recommendation.
- PTAC's reports to the Secretary are posted on the [ASPE PTAC website](#) and announced via the [listserv](#).
- In addition to evaluating stakeholder-submitted proposals based on the 10 criteria set forth by the Secretary, PTAC may also extend its expert opinion to further inform the Secretary about certain issues or factors that a given proposal raises and/or identify alternative approaches relating to the proposed payment model.

Secretary's Response to PTAC Reports

- MACRA requires the Secretary to review PTAC's comments and recommendations on proposals and to post a detailed response to PTAC's comments and recommendations related to the extent to which the proposal meets the Secretary's criteria.
 - The Secretary's responses are posted on the CMS website.
 - The timeline for posting the Secretary's responses is not mandated in law.
- PTAC may also extend its expert opinion to further inform the Secretary about certain issues or factors that a given proposal raises and/or identify alternative approaches relating to the proposed payment model (including findings from any supplemental analyses that have been conducted to facilitate the Committee's ability to provide additional feedback relating to these topics).
 - While PTAC may provide such additional feedback to the Secretary, the Secretary is not required to respond to any feedback outside of PTAC's comments and recommendations relating to the extent to which the proposal meets the criteria established by the Secretary in regulation.

Details of the Proposal Review Process



* For Track 1 proposals, the full PTAC will also vote on an overall recommendation.

** PTAC may also provide additional feedback to the Secretary based on its expert assessment of a proposal (including findings from any supplemental analyses); however, the Secretary is not required to respond to any feedback that is provided outside of PTAC's comments and recommendations relating to the extent to which the proposal meets the criteria established by the Secretary in regulation.

Resources for Stakeholders

- [ASPE PTAC Website](#)
- [PTAC Proposal Submission Instructions](#)
- [Common Alternative Payment Model \(APM\) Approaches: Reference Guide](#)
- [PTAC Email Listserv](#)