Preliminary Comments Development Team (PCDT) Presentation:

Payment Issues Related to Population-Based Total Cost of Care Models

Joshua Liao, MD, MSc (Lead)
Paul N. Casale, MD, MPH
Lawrence Kosinski, MD, MBA
Walter Lin, MD, MBA
Terry (Lee) Mills Jr., MD, MMM
Soujanya "Chinni" Pulluru, MD

September 19, 2022
Objectives of This Theme-Based Meeting

Examine key issues related to the development and implementation of population-based total cost of care (PB-TCOC) models

- March public meeting focused on key definitions, issues, and opportunities
- June public meeting focused on assessing best practices in care delivery
- September public meeting focuses on payment issues

Explore options for incentivizing desired care delivery innovations within PB-TCOC models, and encouraging specialty integration

Relevance:

- PTAC has deliberated on the extent to which 28 proposed physician-focused payment models (PFPMs) met the Secretary’s 10 regulatory criteria (including Criterion 2, “Quality and Cost”)
- Many of these proposals sought to reduce TCOC and raised issues regarding specialty integration

Nearly all of the 35 proposals that have been submitted to PTAC addressed the potential impact on costs, to some degree – including at least 10 proposals that discussed the use of total cost of care (TCOC) measures in their payment methodology and performance reporting. Please see the Appendix for additional information.
Definition of Population-Based TCOC Models

• PTAC’s working definition of PB-TCOC models:
  – Alternative Payment Model (APM) in which participating entities assume **accountability for quality and TCOC** and receive payments for **all covered health care costs** for a broadly defined population with varying health care needs during the course of a year (365 days).

• This definition will likely continue to evolve as the Committee collects additional information from stakeholders.

Please see the Environmental Scan on Population-Based Total Cost of Care (TCOC) in the Context of Alternative Payment Models (APMs) and Physician-Focused Payment Models (PFPMs) for additional information.
Desired Features of PB-TCOC Models

**Desired Payment Features**

1. Provider accountability and risk-bearing features with entity-level actuarial risk
2. Comprehensive participation strategy that encompasses voluntary and mandatory participation
3. Contemporaneous value-based payments
4. Financial accountability for equity and quality outcomes
5. Provider and beneficiary incentives

**Enablers**

- Flexibility for accountable entities to determine how to structure care delivery and primary care / specialty care alignment
- Multi payer alignment on payment approaches and rules
- Rewarding both improvement and absolute levels of performance

**Desired Care Delivery Features**

1. Multidisciplinary team-based, patient-centered care
2. Balanced use of, and coordination between, primary care and specialty care
3. Targeted population-based interventions to prevent or mitigate populations’ risk of developing adverse health outcomes – particularly for those with complex needs
4. Identification of health-related social needs and connection to appropriate resources

**Desired Vision and Culture**

1. A culture of accountability for clinical, quality, equity, and cost outcomes
2. Proactive, preventive care that prevents or mitigates populations’ risk of developing adverse health outcomes
3. Optimal outcomes and eradicated racial and socioeconomic health care disparities
4. Care coordination that meets the needs of all populations, including underserved communities
5. Use of evidence-based diagnostic and treatment protocols
6. Dissemination and uptake of best practices
7. PB TCOC model participation among a broad range of providers

**Enablers**

- Real-time access to actionable data
- Forums for the sharing of best practices
- Infrastructure investments in staff and information technology to enable value-based care
- Access to information and metrics on best practices
- Multi payer alignment on performance metrics to incentivize improvements in quality, outcomes and patient experience
Opportunities and Challenges Associated With Selected Payment Methodologies

Opportunities

**Capitation**
- Incentives for providers to engage in care delivery transformation
- Clarity of provider-population alignment
- Flexibility in care delivery innovations
- Flexibility in care networks
- Balance between access and reduction of avoidable services
- Ramp up for providers with less PB-TCOC experience

**FFS with shared savings +/− losses**

Challenges

- Risk of under-provision of care and lower access
- Determining prospective budgets
- Risk adjustment
- Progressive difficulty performing against benchmark
- Time delay in understanding performance and delivering financial incentives
- Risk of over-provision of care

Certain opportunities and challenges may be characterized as more conceptual or operational in nature.
### Opportunities and Challenges Associated With Selected Population-Based Payment Methodologies

<table>
<thead>
<tr>
<th>Methodology</th>
<th>Opportunities</th>
<th>Challenges</th>
<th>Example</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Full Capitation</strong></td>
<td>Increased incentives to engage in care transformation; flexibility in care networks; clarity about provider-population alignment</td>
<td>Risk of under-provision of care and lower access; determining prospective budgets</td>
<td>Medicare Advantage</td>
</tr>
<tr>
<td><strong>Partial Capitation</strong></td>
<td>Flexibility in care delivery innovations; facilitate transition to increased risk</td>
<td>Risk adjustment; progressive difficulty performing against benchmark</td>
<td>Global and Professional Direct Contracting Model (now ACO REACH)</td>
</tr>
<tr>
<td><strong>FFS with retrospective shared savings + / - losses</strong></td>
<td>Balance between access and reduction of avoidable services; ramp up for providers with less PB-TCOC experience</td>
<td>Time delay in understanding performance and delivering financial incentives (from reconciliation); risk of over-provision of care</td>
<td>Medicare Shared Savings Program</td>
</tr>
</tbody>
</table>
# Opportunities and Challenges Associated With Selected Episode-Based Payment Methodologies

<table>
<thead>
<tr>
<th>Methodology</th>
<th>Opportunities</th>
<th>Challenges</th>
<th>Example</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Prospective</strong></td>
<td>Increased incentives to engage in care transformation; flexibility in care delivery innovations; clarity about provider-population alignment</td>
<td>Risk of under-provision of care and lower access; determining prospective budgets</td>
<td>Bundled Payments for Care Improvement Initiative Model 4*; Employers Centers of Excellence Network</td>
</tr>
<tr>
<td><strong>FFS with retrospective shared savings + / - losses</strong></td>
<td>Balance between access and reduction of avoidable services; ramp up for providers with less episode-based TCOC experience</td>
<td>Risk adjustment; progressive difficulty performing against benchmarks; time delay in understanding performance and delivering financial incentives (from reconciliation); risk of over-provision of care</td>
<td>Bundled Payments for Care Improvement Initiative Models 1-3*; Comprehensive Care for Joint Replacement Model</td>
</tr>
</tbody>
</table>

*The Bundled Payments for Care Improvement (BPCI) Initiative included four models of care that bundled payments for services received during certain episodes of care with the aim of improving quality and care coordination while reducing cost to Medicare. BPCI Models 1-3 focused on retrospective payments; however, Model 4 involved a single, prospectively determined bundled payment for the episode of care.*
PB-TCOC Model Design Considerations

- Participation incentives and organizational requirements (size and capabilities of accountable entities) *
- Upfront resources and infrastructure to support desired care delivery transformation *
- Level of financial accountability for clinical, quality, equity and cost outcomes (clinician, entity, other level) *
- Attribution, benchmarking, and risk adjustment *
- Selection and use of performance metrics *
- Duration of accountability period (e.g., 365 days vs. another duration)
- Incentives to encourage clinical coordination and integration between primary and specialty care
- Overlap between PB-TCOC and other models (e.g., nesting, carve-outs)
- Incentivizes for screening and referral for health-related social needs
- Encouragement of multi-payer alignment on model design components
A major factor that can influence providers’ decisions to participate in PB-TCOC models is whether upfront resources and infrastructure are sufficient to promote care delivery changes.

Other factors that may influence providers’ participation decisions:

- Appropriateness of rules related to performance and accountability
- Consistency between model requirements and organizational capabilities
- Whether payment appears reasonable and sufficient to cover the cost of services
- Whether participants are financially rewarded for improving patient outcomes and experience
Financial accountability relates to the amount of potential financial upside (increased payments) and downside (decreased payments) that providers assume as PB-TCOC participants.

Challenges include assigning accountability at different levels within a PB-TCOC participant, including:

- At the level of the PB-TCOC participant entity
- At the level of entities (practices, hospitals, etc.) within a PB-TCOC participant
- At the level of individual clinicians or smaller groups of clinicians
Model Design Considerations Associated With Attribution

Attribution seeks to identify the beneficiaries whose care a PB-TCOC participant is accountable for managing.

Challenges include ensuring clarity and consistency of the relationship between beneficiaries and an accountable PB-TCOC participant, particularly when beneficiaries are being seen regularly by multiple providers.
Benchmarks

• Benchmarks (e.g., historical averages) can establish incentives for participation in APMs and attempt to constrain spending growth

• Challenges include setting and updating benchmarks using geographic, organizational type, and other factors

Risk Adjustment

• Risk adjustment seeks to enable fair comparisons across entities and minimize risk selection (where entities may select healthier, lower-cost patients)

• Challenges include capturing risk without inappropriate coding changes
While PB-TCOC models are typically focused on rewarding absolute *achievement* in performance, rewarding *improvement* in performance can encourage provider engagement and care delivery innovation.

Even if not used as formal performance metrics for determining payment, metrics that capture certain processes (e.g., number of primary care and overall encounters) may be useful to monitor within PB-TCOC models for the purposes of understanding processes that are associated with strong achievement or improvement.
Areas of Focus for Discussion During the September Meeting

- Long-term vision for PB-TCOC payment methodologies
- Payment model design considerations and financial incentives that are most important for encouraging provider accountability and successful care transformation in PB-TCOC models
- Strategies for improving clinical integration of primary care and specialty care
- Care delivery innovations for higher cost / higher risk populations
- Selection of performance metrics for PB-TCOC models
- Most important steps for maximizing the impact of PB-TCOC models on outcomes
Appendix on Innovative Payment Methodology Approaches in Proposals Submitted to PTAC
Selected PTAC Proposals that Included TCOC-Related Components*

Nearly all of the proposals that have been submitted to PTAC addressed the potential impact on costs, to some degree – including at least 10 proposals that discussed the use of total cost of care (TCOC) measures in their payment methodology and performance reporting.

**Advanced Primary Care Proposal:**
- American Academy of Family Physicians (AAFP)

**Population-Specific Proposals:**
- American Academy of Hospice and Palliative Medicine (AAHPM)
- Coalition to Transform Advanced Care (C-TAC)
- University of Chicago Medicine (UChicago)

**Episode-Based Proposals:**
- American College of Surgeons (ACS)
- American Society of Clinical Oncology (ASCO)
- Avera Health (Avera)
- Large Urology Group Practice Association (LUGPA)
- New York City Department of Health and Mental Hygiene (NYC DOHMH)
- Illinois Gastroenterology Group and SonarMD, LLC (IGG/SonarMD)

* These proposals were identified using TCOC-based keyword searches of key documents related to the Committee’s proposal review process, and were selected to include a diversity of provider types, care models and clinical settings, and payment approaches that are relevant for a discussion of the use of TCOC in multiple contexts.
## Key Characteristics of Selected PTAC Proposals with TCOC-Related Components

<table>
<thead>
<tr>
<th>Submitter Name</th>
<th>Proposal Type</th>
<th>Patient Population</th>
<th>Clinical Focus</th>
<th>Setting</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. AAFP</strong></td>
<td>Advanced Primary Care</td>
<td>Medicare beneficiaries</td>
<td>Primary care</td>
<td>Primary care practices</td>
</tr>
<tr>
<td><strong>2. AAHPM</strong></td>
<td>Population-specific</td>
<td>Beneficiaries with serious/advanced illness</td>
<td>Palliative care</td>
<td>Inpatient, outpatient</td>
</tr>
<tr>
<td><strong>3. ACS</strong></td>
<td>Episode-based</td>
<td>Beneficiaries having at least one of over 100 conditions or procedures</td>
<td>Cross-clinical</td>
<td>Inpatient, outpatient, ambulatory</td>
</tr>
<tr>
<td><strong>4. ASCO</strong></td>
<td>Episode-based</td>
<td>Cancer patients</td>
<td>Cancer care</td>
<td>Inpatient, outpatient</td>
</tr>
<tr>
<td><strong>5. Avera</strong></td>
<td>Episode-based</td>
<td>Beneficiaries who reside in SNFs</td>
<td>Primary care in SNFs and Nursing Facilities (NFs)</td>
<td>SNFs, NFs</td>
</tr>
<tr>
<td><strong>6. C-TAC</strong></td>
<td>Population-specific</td>
<td>Beneficiaries with advanced illness, focusing on last 12 months of life</td>
<td>Palliative care</td>
<td>Patient home</td>
</tr>
<tr>
<td><strong>7. NYC DOHMH</strong></td>
<td>Episode-based</td>
<td>Beneficiaries with hepatitis C infection</td>
<td>Hepatitis C virus</td>
<td>Primary care and specialty practices</td>
</tr>
<tr>
<td><strong>8. IGG/SonarMD</strong></td>
<td>Episode-based</td>
<td>Beneficiaries with chronic illness (Crohn’s Disease)</td>
<td>Chronic disease (Crohn’s Disease)</td>
<td>Patient home</td>
</tr>
<tr>
<td><strong>9. LUGPA</strong></td>
<td>Episode-based</td>
<td>Beneficiaries who are newly diagnosed with prostate cancer</td>
<td>Urology/oncology</td>
<td>Urology and multispecialty practices</td>
</tr>
<tr>
<td><strong>10. UChicago</strong></td>
<td>Population-specific</td>
<td>Frail/complex beneficiaries with hospitalizations</td>
<td>Frequently hospitalized patients</td>
<td>Patient home and rehabilitation sites</td>
</tr>
</tbody>
</table>
# Payment Characteristics of 10 PTAC Proposals with TCOC-Related Components

<table>
<thead>
<tr>
<th>Submitter Name</th>
<th>Payment Mechanism</th>
<th>Shared Risk</th>
<th>Risk Adjustment</th>
<th>TCOC-Related Payment Elements</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. AAFP</td>
<td>Per Beneficiary Per Month (PBPM)</td>
<td>*</td>
<td>■</td>
<td>Prospective, risk-adjusted PBPM payment for primary care; prospectively awarded performance-based incentive payments</td>
</tr>
<tr>
<td>2. AAHPM</td>
<td>PBPM</td>
<td>■</td>
<td>■</td>
<td>Up-front base PBPM payments with performance-based incentives/penalties or shared shavings/losses linked to TCOC</td>
</tr>
<tr>
<td>3. ACS</td>
<td>Episode-Based</td>
<td>■</td>
<td>■</td>
<td>Retrospective incentive payments based on difference between observed and expected spending</td>
</tr>
<tr>
<td>4. ASCO</td>
<td>Episode-Based</td>
<td>■</td>
<td>■</td>
<td>Prospective care management payments; bundled payments for value of specified services (Track 2 only)</td>
</tr>
<tr>
<td>5. Avera</td>
<td>PBPM</td>
<td>■</td>
<td>■</td>
<td>Prospective payments dependent on quality and financial performance (one-time payment for new admissions and PBPM payments)</td>
</tr>
<tr>
<td>6. C-TAC</td>
<td>PBPM</td>
<td>■</td>
<td>■</td>
<td>Wage-adjusted PMPM payments for the last 12 months of life and quality bonus payments or shared losses based on TCOC</td>
</tr>
<tr>
<td>7. NYC DOHMH</td>
<td>Bundled Episode-Based/Monthly</td>
<td>■</td>
<td>■</td>
<td>Prospective bundled payment</td>
</tr>
<tr>
<td>8. IGG/SonarMD</td>
<td>PBPM</td>
<td>■</td>
<td>■</td>
<td>Prospective PMPM payment with retrospective reconciliation; additional monthly payments for non-“face to face” services</td>
</tr>
<tr>
<td>9. LUGPA</td>
<td>PBPM</td>
<td>■</td>
<td>■</td>
<td>Prospective care management payment; retrospective performance-based payment based on difference between target and actual spending</td>
</tr>
<tr>
<td>10. UChicago</td>
<td>PBPM</td>
<td>■</td>
<td></td>
<td>PBPM care continuity fee (for physicians who meet benchmarks for providing their patients with both inpatient and outpatient care)</td>
</tr>
</tbody>
</table>

* The AAFP proposal explicitly states that the proposed model does not incorporate provider financial risk; however, the proposed model includes what the proposal refers to as “performance risk” whereby participating entities that meet quality and cost benchmarks retain their incentive payments and maintain their standing in the APM.