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May 29, 2018

Physician-Focused Payment Model Technical Advisory Committee  
C/o U.S. DHHS ASPE Office of Health Policy  
200 Independence Avenue S.W., Washington, D.C. 20201  
[PTAC@hhs.gov](mailto:PTAC@hhs.gov)

Re: AAN, Patient-Centered Headache Care Payment

Dear Committee Members:

On behalf of the American Academy of Neurology (AAN), we would like to express intent to submit a Physician-Focused Payment Model for PTAC review on June 29, 2018.

**Expected Participants**

**Target Population**

The patient-centered headache care payment (PCHCP) is an alternative payment model targeted at Medicare patients with headaches that are undiagnosed, difficult-to-diagnose, or poorly controlled and require neurologist attention for diagnosis and management.

**Physician and Other Provider Participation**

This model centers on the specialty care and expertise that neurologists provide. There are approximately 17,000 actively practicing neurologists in the US. Headache represents a large part of neurologists' practice; more than 20 percent of ambulatory visits for headache are with neurologists.<sup>1</sup>

Primary care providers (PCPs) are a key stakeholder in the model. The vast majority of headaches are adequately cared for by PCPs. As partners in the model, PCPs would have the awareness, education, and incentive to refer patients with headaches that are undiagnosed, difficult-to-diagnose, or difficult-to-control to the appropriate specialist.

Persons with difficult to control headache are best managed by a comprehensive strategy addressing prevention, lifestyle changes, and other education and support. As such, the model enables a Headache Care Team (HCT). The HCT may be comprised of a nutritionist, physical therapist, occupational therapist, mental health, or social service provider depending on patient need.

**Goals of the Payment Model**

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<sup>1</sup> <https://www.ncbi.nlm.nih.gov/pubmed/25600719>

The ultimate goal of the model is to improve outcomes for patients by ensuring accurate and efficient diagnosis, appropriate, cost-effective treatment, and the prevention of future costs while also controlling costs for payers

## **Model Overview**

### **Payment Structure**

Patients with headaches differ significantly in the types, frequency, and severity of headaches, the level of disability the headaches create, and the ability of available therapies to control their headaches. For each category of the PCHCP, the neurologist would receive a predetermined, fixed payment per patient to support all the headache-related clinical services. These are defined as evaluation and management (E/M) services for headache-related care. The neurologist would receive a fixed amount based on PCHCP category and adjusted for comorbidities and/or headache severity.

### **Advanced Alternative Payment Model Applicability**

The AAN believes the proposed payment model would likely meet MACRA requirements for an alternative payment model.

### **Implementation Strategy**

The AAN is the largest neurologic society in the United States, with the the largest share of neurologist members (90%) and a rapidly growing APP membership. We have fielded this model to a subset of our membership and identified at least 12 neurology practices eager to implement this payment model. In our member-serving capacity, the AAN is prepared to provide technical assistance for model implementation to ensure practices of all sizes and settings are successful in the PCHCP.

The AAN solicited and incorporated feedback from across membership as well as partner organizations and leaders in headache care delivery such as the American Migraine Foundation and American Headache Society.

### **Timeline**

The AAN intends to submit the proposal for PTAC consideration on June 29, 2018. Using Center for Medicare and Medicaid Innovation (CMMI) implementation experience as a guide, the AAN anticipates a 12 to 16-month interim period between announcement of model and implementation. In the interim, the AAN is exploring pilot implementation of the model with several AAN member practices.

Thank you for your consideration of our patient-centered headache care payment. If you have questions, please contact Amanda Napoles at [anapoles@aan.com](mailto:anapoles@aan.com) or 612.928.6094.

Sincerely,

Ralph L. Sacco, MD, FAAN  
President, American Academy of Neurology

Joel M. Kaufman, MD, FAAN  
Chair, AAN Payment Alternatives Team

