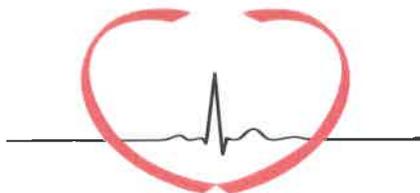


## Clearwater Cardiovascular



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April 13, 2018

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

Letter of Intent – Frederic R. Simmons, Jr., CPA - Bundled PCI Services in a Non-hospital Cath Lab

Dear Committee Members,

On behalf of Clearwater Cardiovascular and Interventional Consultants, M.D., P.A. (CCC) I intend to submit a Physician-Focused Payment Model for PTAC review on May 15, 2018.

#### **Payment Model Overview**

The proposed Bundled PCI Services in a Non-hospital Cath Lab (Bundled PCI Services) model offers Medicare fixed physician and facility fees for outpatient Percutaneous Coronary Intervention (PCI) Services in a non-hospital cardiac catheterization laboratory, at a per case savings of \$1,285 to \$3,105, compared to the current cost of hospital-performed procedures.

In addition to the initial cost savings, we are proposing participating providers in Bundled PCI Services share in the risk of managing 90 day post procedure cost similar to the risk sharing in the BPCI Advanced Outpatient PCI Episode.

This model will meet the MACRA definition for a Physician Focused Payment Model (PFPM). In addition, the proposal will likely be considered an Advanced Alternative Payment Model as we incorporate shared risk and requirements, reporting outcomes and quality, and certified electronic health record technology into the model.

#### **Goals of the Model**

The goal of Bundled PCI Services is to provide high-quality outpatient PCI services to Medicare patients in a non-hospital cath lab with excellent results and high patient satisfaction, while generating cost savings to the Medicare program and its beneficiaries.

PCI services have been provided with separate charges for professional and facilities fees in hospital-owned inpatient and outpatient cath labs for several years. By bundling services and allowing non-hospital labs to participate, costs are reduced while offering a safe and efficient option for patients in need of uncomplicated PCI services.

### **Expected Participants**

Patients with a need for uncomplicated PCI are anticipated to participate due to the convenience and higher patient satisfaction ratings in a non-hospital cath lab.

The proposed initial non-hospital cath lab would be the CCC Outpatient Cath Lab, building on our success providing Bundled PCI Services to managed care patients for the last two years. Other medical groups, cardiology practices, interventional cardiologists, and appropriate non-hospital outpatient cath labs would be included as these facilities incorporate the strict requirements of the model to qualify as participants.

CCC is in a unique position to demonstrate the effectiveness of the proposed model due to its history managing and operating hospital and non-hospital outpatient cath labs. On January 1, 2016, CCC acquired the Morton Plant Hospital Outpatient Cath Lab (now the CCC Outpatient Cath Lab) located on the campus of Morton Plant Hospital in Clearwater, Florida. Prior to January 1, 2016, PCI services were provided in the Morton Plant Hospital Outpatient Cath Lab and billed as hospital outpatient under Medicare place of service 22 (POS 22). Beginning January 1, 2016, CCC began providing Bundled PCI services to managed care plans in the CCC Outpatient Cath Lab under Medicare place of service 11 (POS 11). Since then, CCC has performed over 800 bundled PCI procedures for managed care plan patients with excellent results, outstanding patient satisfaction at a fixed rate, and a lower cost than the managed care plans would pay in a hospital outpatient lab.

CCC monitors appropriateness, outcomes and patient satisfaction results of PCIs performed in the CCC Outpatient Cath Lab. This monitoring is accomplished through CCC's participation in the American College of Cardiology CathPCI Registry and through patient satisfaction surveys.

### **Implementation Strategy**

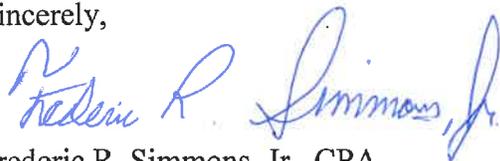
Initial deployment would be through CCC, its 21 cardiologists, its six interventional cardiologists, and the CCC Outpatient Cath Lab. We envision Bundled PCI Services will expand to other cardiology practices, interventional cardiologists, and appropriate non-hospital outpatient cath labs who agree to incorporate the model's requirements for quality and outcomes reporting.

### **Timeline**

As noted above, CCC has been providing Bundled PCI Services to managed care plans and patients since January 2016. The timeline for deployment of this PFPM APM could be as soon as the fourth quarter of 2018. Expansion to at least one other appropriate non-hospital outpatient cath lab would be accomplished by the end of 2020.

We look forward to the opportunity of demonstrating Bundled PCI Services.

Sincerely,

A handwritten signature in blue ink that reads "Frederic R. Simmons, Jr." The signature is fluid and cursive.

Frederic R. Simmons, Jr., CPA  
Chief Executive Officer