MACRA – THE BASICS Getting Ready for the Post-SGR World

Stephen Grubbs, MD Sybil Green, JD February 2016



To Ask a Question

You can submit questions by clicking on the Chat icon on the Webex toolbar at the top of the screen

- Send to 'Host'
- Type your question in the text box and hit "send"
- Additional questions after the webinar can be sent to <u>macra@asco.org</u>



Presentation Overview:

✓ Review SGR/SGR Appeal ✓MACRA Goals CMS Quality Improvement Goals ✓General Timelines and Milestones ✓MACRA Details ✓MIPS ✓APMs

✓ASCO Member Readiness



A Wild Ride on the Sustainable Growth Rate Roller Coaster Comes to an End



How Repeal of the Sustainable Growth Rate Formula Happened

- March 26, 2015: House passes the Medicare Access and CHIP Reauthorization Act of 2015 to (392-37) which permanently repeals and replaces the SGR
- April 14, 2015: Senate passes the Medicare Access and CHIP Reauthorization Act of 2015 (92-8)
- April 16, 2015: President signs Medicare Access and CHIP Reauthorization Act of 2015 into law

WHY ASCO SUPPORTED REPEAL

Issues with SGR ...

- Unworkable formula
- Annual uncertainty
- Piecemeal approach to incentives

Promise of MACRA...

Rewards quality and value-based care
 Allows practice organization as desired
 Consolidated incentive programs



A NEW ACRONYM Medicare Access and CHIP Reauthorization Act

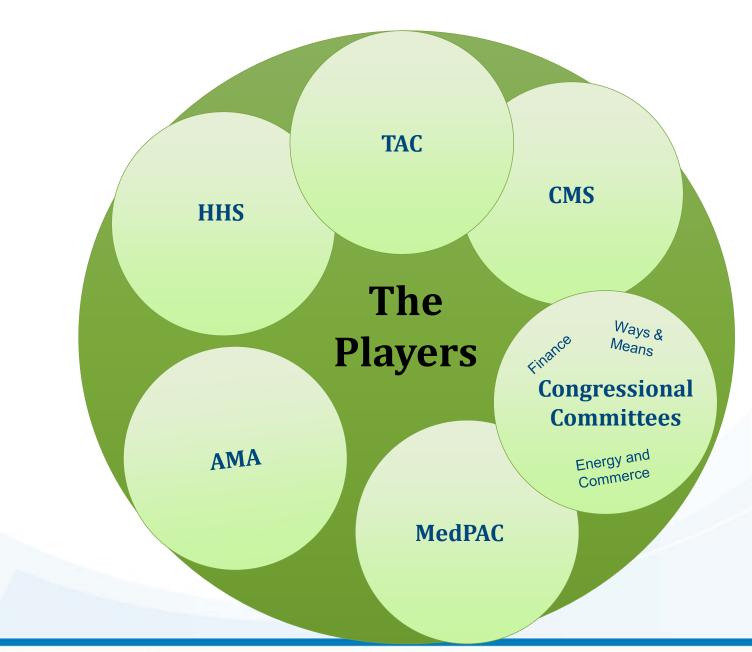




MACRA - REALIZING THE PROMISE

- Built in period of stability
 - ... but things are moving now
- Push to Alternative Payment Models
- Focus on Registries and QCDRs
- Streamlines current reporting requirements
- Provides some support for practice transformation







THERE ARE OPPORTUNITIES AND THREATS HERE

- Specialty APMs
- Quality measure development
- Dialogue often with decision makers
- Advisory opportunities
- Path for QOPI/CancerLinQ, PCOP

- A lot has to happen very quickly
- Congress already looking to Medicare payments as "pay for"

Unknowns e.g. resource use, composite score threshold



We Caught the Car...SGR is Gone. ...Now What?

THIS

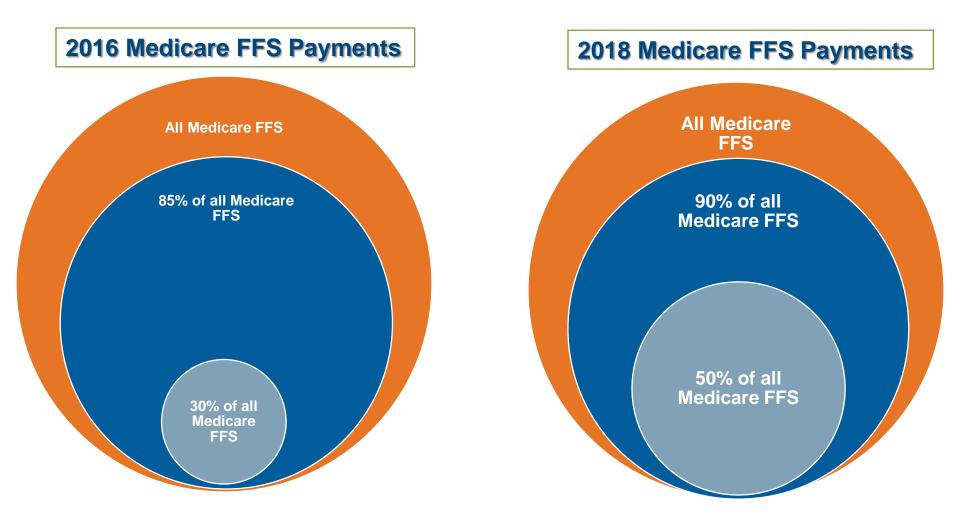


NOT THIS





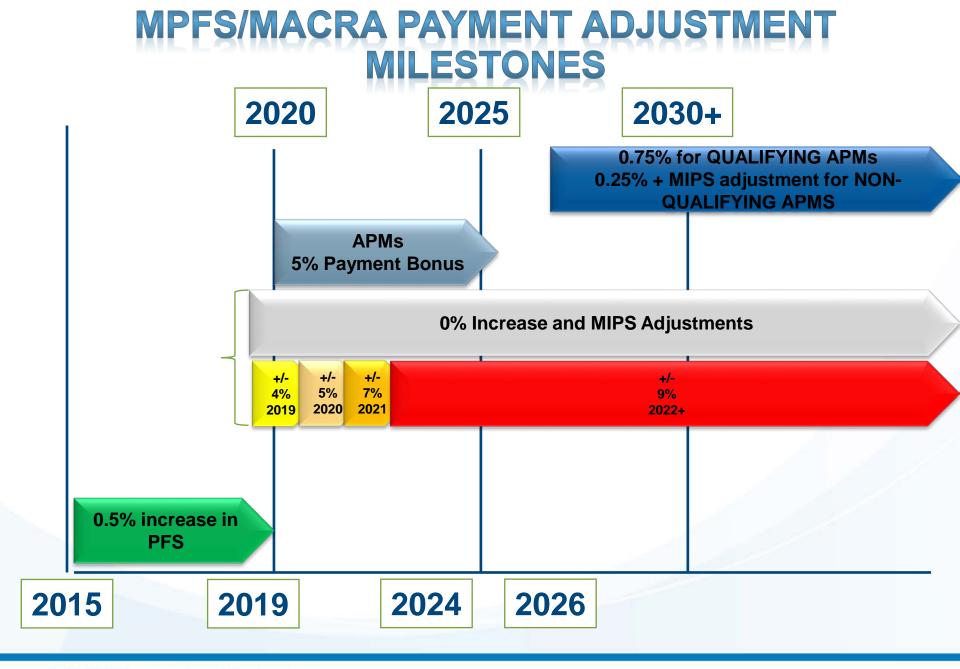
CMS QUALITY IMPROVEMENT GOALS



Alternative Payment Models

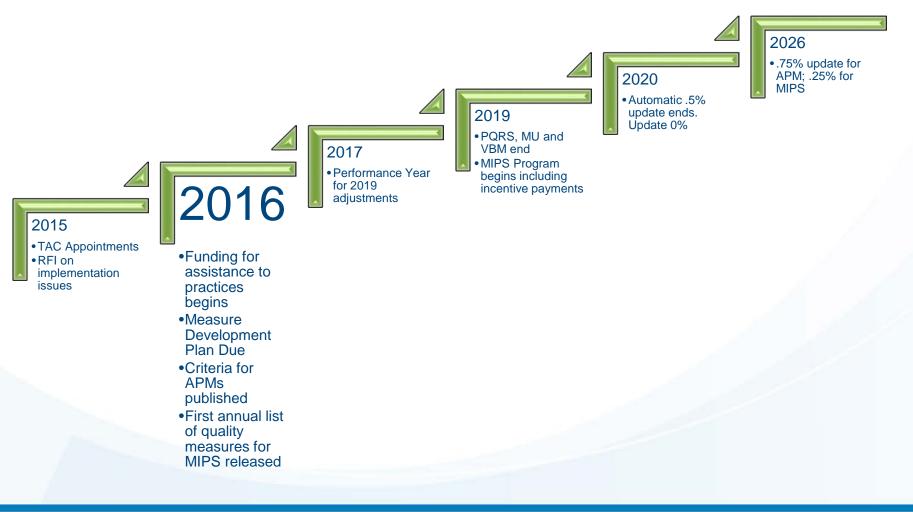
FFS Linked to Quality

All Medicare FFS 100%





GENERAL TIMELINE

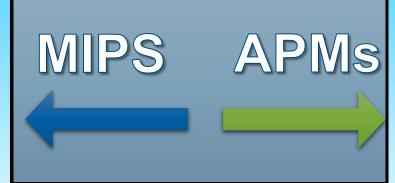


ASCO

2019 MACRA PAYMENT OPTIONS

Merit Based Incentive Payment System

- Default
- 0-100 Composite Scoring
- PQRS, RU, CPIA, MU
- +/- 4-9% Adjustments



Alternative Payment Models

- New Delivery Models
- Physician Focused Payment
 Model
- 5% Payment Adjustment
- Quality & Value Measures

MERIT-BASED INCENTIVE PAYMENT SYSTEM (MIPS)



MIPS: GENERAL STRUCTURE

Merit-Based Incentive Payment System

> MIPS Eligibility

Scores will be publicly reported on the CMS Physician – Compare website

MIPS consolidates and leverages the MU, PQRS, and VBM programs

>The MIPS payment adjustments can be significant



MERIT-BASED INCENTIVE PAYMENT SYSTEM

Measures Medicare Part B providers in four performance categories:

- Quality
- Value Based Modifier
- Meaningful Use
- Clinical Practice Improvement

Assigns a composite score of 0-100
 Score reimbursement impact ranges start at a minimum +/- 4 and increases to at least +/- 9
 For the 2015 and 2016 performance years, the VBM, PQRS, and MU programs will continue as separate payment adjustment programs.



MIPS ELIGIBILITY - PROVIDERS

Years 1 and 2, Eligible Providers include:

Physicians
 Physician Assistants
 Nurse Practitioners
 Clinical Nurse Specialists
 Nurse Anesthetists

Years 3 and beyond, Eligible Providers include:

- Occupational Therapists
- Speech-language Pathologists
- ≻Audiologists
- ≻Nurse Midwives
- Clinical Social Workers
- Clinical Psychologists
- Dieticians/nutrition professionals



MIPS ELIGIBILITY - EXCLUSIONS

Only three classes of Part B providers are exempt from MIPS:

- >APM Participants
- Low patient volume
- First time Medicare providers



MIPS - PUBLIC REPORTING

Scores will be publicly reported on the CMS Physician –Compare website

- Composite score rating reported
- ≻All providers
- Comparison to peers
- Available to consumers



MIPS - EXISTING PROGRAMS

MIPS consolidates and leverages the current MU, PQRS, and VBM programs

- ➢ Medicare MU and PQRS penalties, and
- ➢VBM incentives and penalties
- Maximum of 25 points earned for MU Compliance
- >The MIPS quality category score based on:
 - PQRS mandatory quality reporting requirement; and
 - VBM quality score.



MIPS – PAYMENT ADJUSTMENT

The MIPS payment adjustments can be significant

- Score reimbursement impact ranges start at a minimum
 - +/- 4 and increases to at least +/- 9
 - Exceptional performers can receive up to 3x the incentive
- Must be budget neutral
 - Winners and Losers
 - MIPS incentive pool equal to penalty pool



MACRA STREAMLINES CURRENT REPORTING PROCESS

2025

Current Programs

- Physican Quality
 Reporting System
- Meaningful Use
- Value-Based Modifier
- Incentives/Penalties
- Sunset Dec. 2018

2016 through 2018 Meri Syst

VBM

MIPS 2019 and Beyond

MU

Merit-based Incentive Payment System

CPIA (2019)

- Consolidates existing program
- Adds Clinical Practice
 Improvement Activity
- Incentives/Penalties
- Focuses on quality, not volume
- Jan. 2019 Implementation



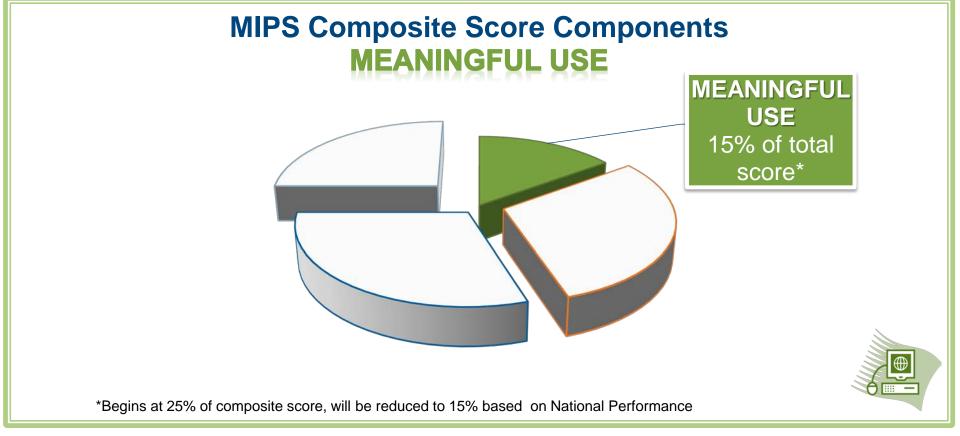
American Society of Clinical Oncology Making a world of difference in cancer care 2019 and Beyond

MIPS Composite Score Components QUALITY QUALITY (PQRS) 30% of total score in 2021

Incentivizes providers for reporting on specific quality measures

- Annual posting of measures every November
- Will be publicly available
- Measures pulled from PQRS, VBM, HER and MU
- Also considers: clinical care, safety, care coordination, patient experience, and population health and prevention
- 2017 PQRS performance assessed for 2019
- Common Rule/QCDR integration determined in 2016

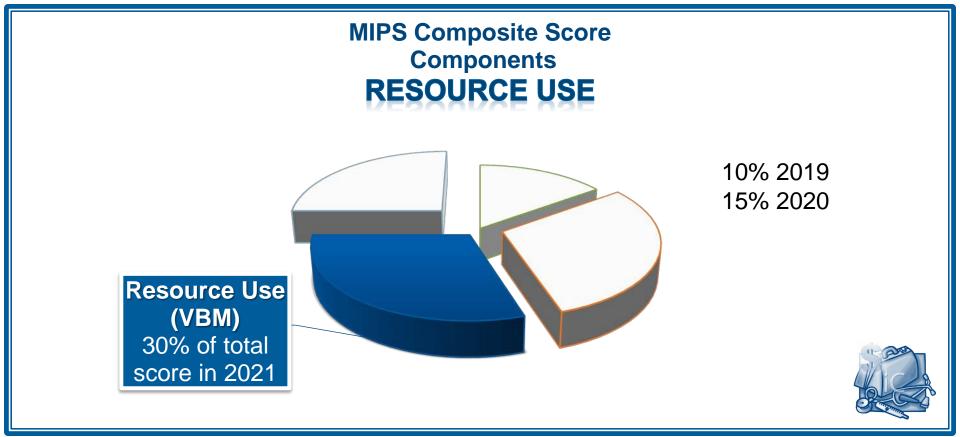
- 2017 PQRS performance assessed for 2019
- Common Rule/QCDR integration determined in 2016



Using EHR to improve quality, safety, efficiency and reduce health disparities.

- Certification standards in 2016 MPFS
- Goal = Interoperability
- 15% credit for reporting quality measures through EHR
- *75% compliance or better will decrease composite weighting

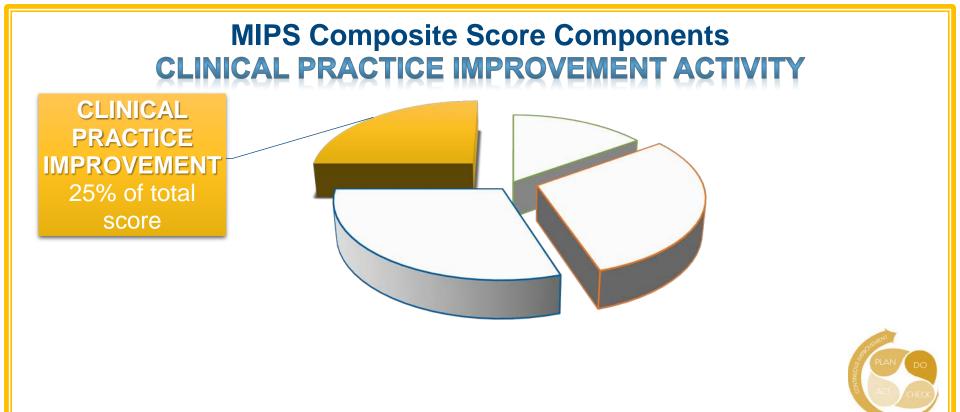
• Jul 2016 goals/metrics for interoperability



Measures cost, including Part D drugs.

- Considers all Part A&B costs
- Part D drugs, as feasible
- Considers costs for specific care episodes and patient relationships

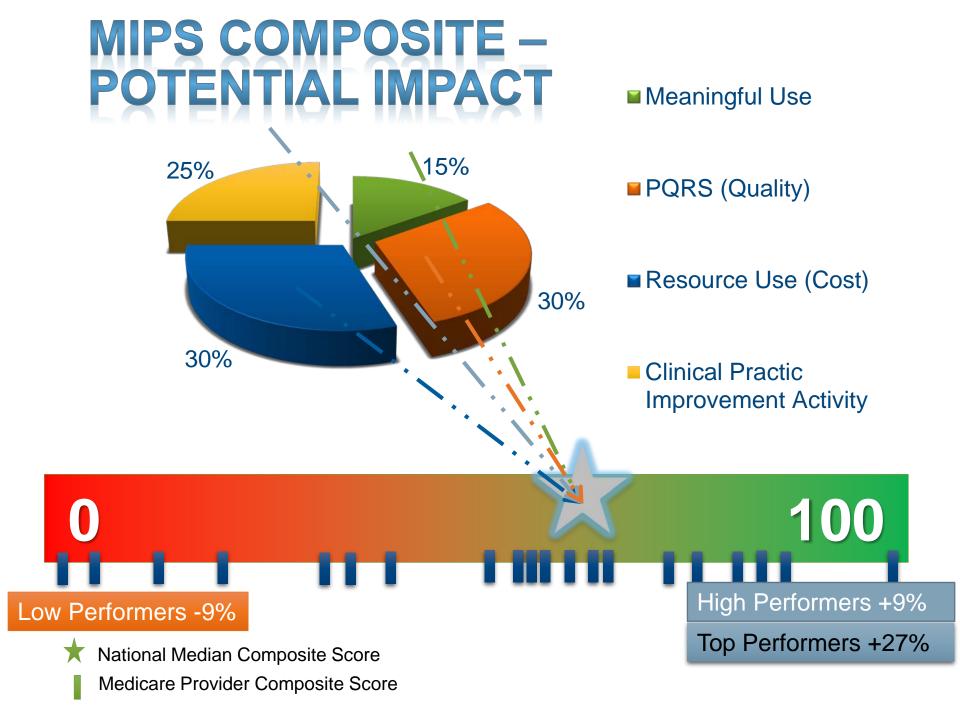
- Establishment of Care Episodes in 2016
- Establishment of Patient Relationship Categories in 2016
- May also apply to Medicare Advantage
- May consider resource use in other programs (as benchmark)



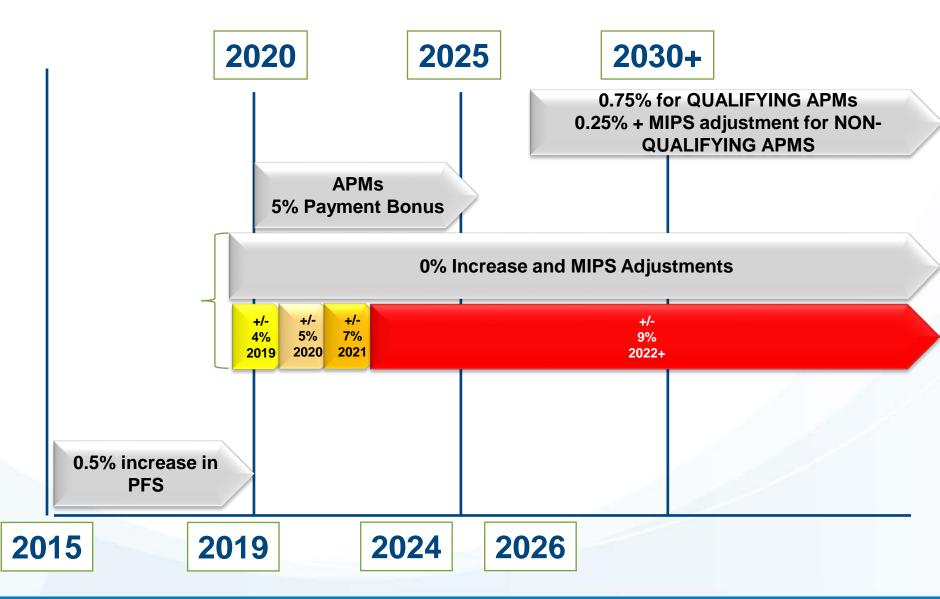
Recognizes activities that contribute to advancing patient care, safety and coordination.

- Expanded practice access
- Population management
- Care coordination
- Beneficiary engagement
- Patient safety
- Participation in APMs
- Participation in QCDR

- Development of categories in 2016
- Stakeholder input includes specialty providers



MIPS PAYMENT ADJUSTMENT MILESTONES





ALTERNATIVE PAYMENT MODELS (APMS)



WHAT IS AN APM UNDER MACRA?



EXISTING MODELS

- New approaches to paying for care
- Incentivizes quality and value
- Some existing models will be eligible APMs
- Non-qualifying APM participants get favorable MIPS scoring

Accountable Care Organizations

Primary Care & Specialty Medical Home Models

Bundled Payment Initiatives

Integrated Care & Care Management



NEW PATHWAY AVAILABLE

Accountable Care Organizations

Primary Care & Medical Home Models

Bundled Payment Initiatives

Integrated Care & Care Management

NEW

PHYSICIAN FOCUSED PAYMENT MODELS (PFPM)



PFPM -STATUTORY REQUIREMENTS

- ≻Quality measures
- Certified EHR
- "more than nominal financial risk" *
- Includes financial incentives (e.g., shared savings)

*CMS designated patient centered medical homes qualify without risk



PFPM - PROCESS

- By November 1, 2016: Secretary must release criteria for qualifying APM, including specialty APMs
- Stakeholders can submit proposals
- "Physician Focused Payment Model Technical Advisory Committee" reviews and advises Secretary (11 member committee, no more than 5 physicians)
- Secretary will respond publicly to requests



HOW TO QUALIFY



APMS – ELIGIBILITY QUALIFYING PARTICIPANTS Qualifying APM Participant (QP): participation in most advanced APM

- Not subject to MIPS
- 2019 2014: 5% lump sum bonus payment
- 2026 beyond: higher fee schedule updated

NOT ALL APM PARTICIPANTS RECOGNIZED AS QPS, but most APM participants will receive favorable MIPS scoring.



APMS – ELIGIBILITY ADVANCED MODELS

Eligible APMs are the most advanced APMs:

- Base payment on quality measures comparable to those in MIPS
- Require use of certified EHR technology
- Either:

(1) bear more than nominal financial risk for monetary losses; or

(2) is a medical home model expanded under CMMI authority



APMS – ELIGIBILITY QPS IN ELIGIBLE APMS

Participation in an eligible APM
 APM must comprise a "significant" share of provider revenue or patients
 25% 2019-2020
 50% 2021-2022*
 75% 2023 and on

* Beginning in 2021 may be Medicare revenue or revenue from Medicare and other payers (including Medicaid)

Can partially qualify if close (specified in law)



QUALIFYING APMS - INCENTIVE PAYMENT

>2019-2024: 5%

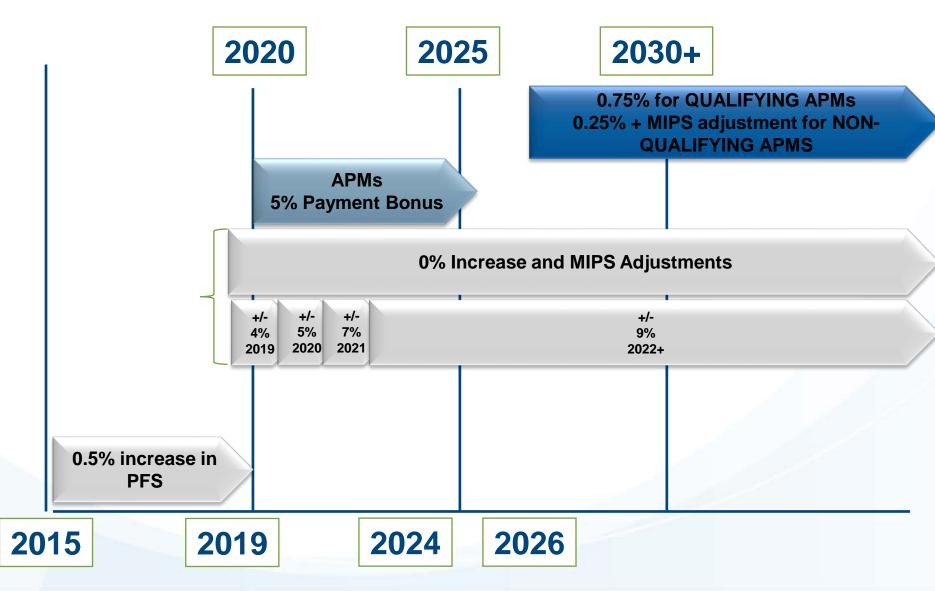
- Annual payment
- Based on estimate of aggregate Part B professional services
- Can extrapolate

>2026 and beyond: 0.75%

*Participation in an APM can help with composite score for MIPS professional



APM PAYMENT ADJUSTMENT MILESTONES





APMS - TECHNICAL ASSISTANCE

Beginning 2016 contract with QIOs or similar organizations

- >\$20 million/year from 2016-2020
- ➢Practices of under 15 or less
- Focused on practices in rural or underserved areas or with low composite scores



POTENTIAL MACRA REWARDS



MIPS adjustment

APMs

- APM- Specific Rewards
- MIPS Adjustment

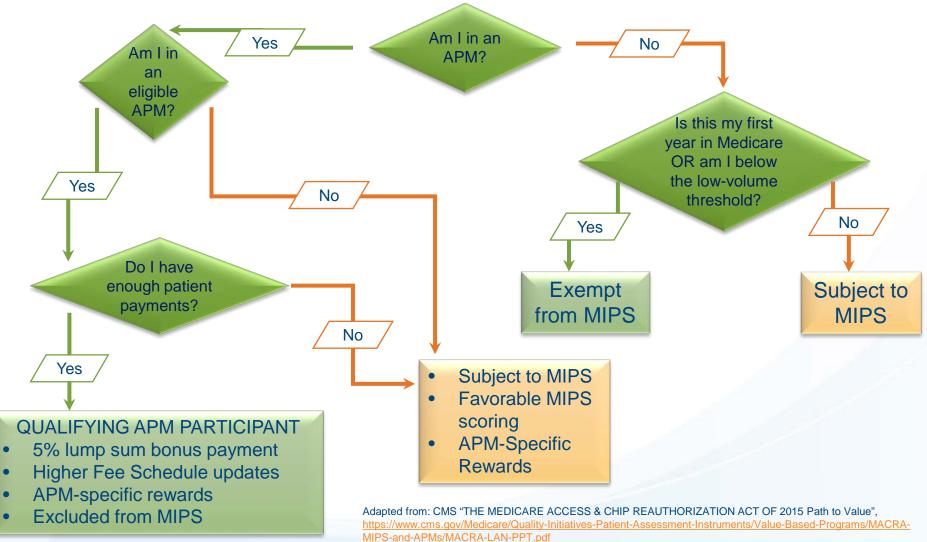
Eligible APMs

- Eligible APM-Specific rewards
- 5% lump sum bonus

Adapted from: CMS "THE MEDICARE ACCESS & CHIP REAUTHORIZATION ACT OF 2015 Path to Value", <u>https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/Value-Based-Programs/MACRA-MIPS-and-APMs/MACRA-LAN-PPT.pdf</u>



HOW WILL MACRA AFFECT ME?





IMPLEMENTING RULES:

CMS seeking Input:

- ✓ 2016 Medicare Physician Fee Schedule
- ✓ Request for Information
- Resource Use Methodology
- Physician Focused Payment Model Technical Advisory Committee
- ✓ HCPLAN APM Framework Whitepaper
- Quality Measure Development Plan
- Meaningful Use EHR Certification Standards
- > 2016 2018 Rulemaking on various programmatic aspects

Stay Tuned....More Implementing Rules Still to be Written



MACRA SUMMARY:

MACRA makes three important changes to how Medicare pays healthcare providers who care for Medicare beneficiaries:

- Repeals the Sustainable Growth Rate (SGR) formula as a mechanism for determining Medicare payments for physicians' services
- Establishes two payment options
 - MIPS
 - APM

Incentivizes practice transformation





MACRA Implementation Timeline

• April 16, 2015: The Medicare Access and CHIP Reauthorization Act of 2015 (MACRA) signed into law, permanently repealing the flawed Sustainable Growth Rate (SGR) • July 2015-December 2019: 0.5 percent annual adjustment for providers 2015 • 2015: Members will be appointed to the Physician-Focused Payment Model Technical Advisory Committee, which evaluates alternative payment Models (APMs) and makes recommendations to CMS 2015-2018: Separate programs and penalties will continue under PQRS, MU and VBM 2015 and Beyond: Annual public release on physician services, charges and payments. Starting in 2016 this will be integrated into 'Physician Compare' • July 2016: A list of MIPS Quality measures for the 2017 performance period will be proposed 2016 November 1, 2016: CMS to set criteria for physician-focused payment models • November 1, 2016 and Beyond: APM proposals will be accepted on a rolling basis • November 1, 2016 and Beyond: MIPS Quality measures due each November 1 for the next performance period • January 1, 2017: The beginning of the performance baseline period for MIPS reporting and scoring, which will 2017 determine 2019 payment adjustments. Physicians must begin MIPS reporting or be participating in a qualified Alternative Payment Model (APM) • December 1, 2018: Each eligible professional (EP) must be informed annually of the MIPS adjustment factor(s) at least 30 days in advance 2018 December 31, 2018: Sunset of PQRS, MU, and VBMs as separate penalties and incentives programs December 31, 2018 : Deadline for achieving interoperability

ASCO: Your Partner in Practice and MACRA Transformation

ASCO is the nation's leading professional oncology society representing over 35,000 physicians and other health professionals who care for people with cancer.





MACRA Implementation Timeline

2019	 January 1, 2019: The MIPS program takes effect, consolidating PQRS, MU, and the VBM. MIPS bonuses and penalties begin to apply to payments for physician services and will be phased in 2019-2024: a 5% bonus to "qualifying APM participants will be applied based on varying criteria throughout the years 2019 and Beyond: composite MIPS scores fully phased in : quality 30%, resource use 30%, meaningful use 25% and clinical practice improvement activities 15%; though these weights may change over time
2020	 <u>2020:</u> Maximum penalties for MIPS will be 5% with the highest MIPS bonuses between 5-15%, with additional bonuses up to 10% for 'exceptional performance' <u>2020-2025</u>: Annual 0.5% update ends and replaced with annual update of 0%
2021	 <u>2021</u>: Maximum penalties for MIPS will be 7% with the highest MIPS bonuses between 7-21%, additional bonuses up to 10% for 'exceptional performance'
2022+	 <u>2022 and Beyond</u>: Maximum penalties for MIPS will be 9% with the highest MIPS bonuses between 9-27%, with additional bonuses up to 10% for 'exceptional performance'
2026+	• 2026 and Beyond: Updates for participation in qualifying APMs will be 0.75% and 0.25% for all other APMs

ASCO: Your Partner in Practice and MACRA Transformation

ASCO is the nation's leading professional oncology society representing over 35,000 physicians and other health professionals who care for people with cancer.



START PREPARING NOW

> MACRA will transform all oncology practices in two major ways:

- how you conduct your Medicare reporting requirements, and
- how you are paid for the services you provide to Medicare beneficiaries
- The ultimate goal of these changes is to move toward a value-based healthcare system that ensures high-quality, affordable health care.
- ASCO has long embraced this goal and has dedicated significant resources that will provide you with the foundation needed
 - Quality Oncology Practice Initiative (QOPI®); and
 - Patient-Centered Oncology Payment Reform model



ASCO STRATEGY FOR MACRA IMPLEMENTATION

- QOPI, CancerLinQ and PCOP will be ASCO's best offering to ensure member success.
- Education and Awareness for ASCO Members
- Practice Transformation/Readiness
- Aggressive Pursuit of Interoperability and Robust Rapid Learning Environment for Oncology



THE BOTTOM LINE...

ASCO is uniquely positioned compared to other specialty organizations

Decisions and actions regarding MACRA must reflect ASCO's vision and current goals and policy priorities

Solution ASCO must be vigilant throughout and be involved at every level of implementation





For the latest MACRA developments, please visit:

www.asco.org/macra



WEBINAR FEEDBACK

A survey will be sent to registered attendees following the webinar today to obtain feedback

https://www.surveymonkey.com/r/VZQ3 MKR





Please submit questions by clicking on the Chat icon on the Webex toolbar at the top of the screen

- Send to 'Host'
- Type your question in the text box and hit "send"
- Additional questions after the webinar can be sent to <u>macra@asco.org</u>

