

Direct Contracting Learning Discussion



The program will begin at 2:00 pm ET.

Introductions.....



	<p>David Pittman Senior Policy Advisor NAACOS</p>
	<p>Jennifer Gasperini Director of Regulatory and Quality Affairs NAACOS</p>
	<p>Dave Ault Counsel Faegre Drinker Biddle & Reath LLP</p>

Ground Rules and Expectations



1. Today's discussion is scheduled for an hour
2. What to expect
 - Our goal is to allow DCEs to share concerns, answer questions and raise points of interest in a collaborative discussion.
 - Feel free to turn your video on and speak up when you feel the need. Please mute yourself when not talking.
3. Today's program is being recorded
 - Recordings will be posted to NAACOS's stand-alone [Direct Contracting page](#)
4. We have a couple topics teed up. Discussion will happen along the way.

Agenda.....



1. Welcomes and housekeeping
2. A couple of teed-up topics
 - a) Quality measurement and reporting
 - b) API claims data feed
3. Open forum and discussion



NAACOS Direct Contracting Resources

- Stand-alone [webpage](#) with CMS and NAACOS resources
- [Overview](#) of Quality Measurement Methodology
- [Summary](#) of Direct Contracting Financial Specifications
- [Frequently Asked Questions](#) on Direct Contracting
- In-depth [analysis](#) of Direct Contracting
- Hosted several webinars, town halls and learning discussions
- To continue today's discussion, we encourage use of our Direct Contracting Listserv. You must sign up first and can do so [here](#).
 - DirContractListServ@naacos.com
- NAACOS staff is also available at DirectContracting@naacos.com

NAACOS Fall Conference



- The NAACOS Fall 2021 Conference is set for Sept. 29–Oct. 1 at the Marriott Marquis in Washington D.C.
- The [full agenda](#) is online along with [registration](#) information
- Plenaries and panels of interest
 - Jon Blum, CMS Principal Deputy Admin
 - “What's Ahead for Direct Contracting”
 - “How Medicare Advantage Experience Drives ACO/Direct Contracting Success”
 - Open Mic with CMS



Key Dates.....



- **Aug. 1** – The second Implementation Period launched
- **Aug. 20** – Courtesy overlap results sent to DCEs
- **Sept. 3** – Notice to providers who will be on 2022 Final Provider List
- **Sept. 10** – Submission of 2022 Final Provider List
- **Sept. 16** – Deadline to drop providers from 2022 Final Provider List
- **Sept. 30** – Submit DCE-level Benefit Enhancement and Beneficiary Engagement Incentive Implementation Plans
- **Early December** – 2022 Preliminary Benchmark Reports sent to DCEs

DC Quality.....



- In PY2022, DCEs will be assessed using the following five Quality Measures:
 1. Risk-Standardized All-Condition Readmission (ACR)
 2. All-Cause Unplanned Admissions for Patients with Multiple Chronic Conditions (UAMCC)
 3. Days at Home for Patients with Complex, Chronic Conditions 5 (DAH, under development)
 4. Timely Follow-Up After Acute Exacerbations of Chronic Conditions (Timely Follow-Up)
 5. Consumer Assessment of Healthcare Providers & Systems (CAHPS®) Survey
- In each PY, 5% of a DCE’s financial benchmark (the Quality Withhold) will be held “at risk” and can be earned back, in part or in full, subject to the DCE’s quality performance on the Quality Measures. Some or all of the 5% Quality Withhold will be tied to **quality reporting** or **quality performance** in each PY
- CMS will use the Quality Measures to calculate a Total Quality Score with a value ranging from 0% to 100% for each DCE in each PY. This Total Quality Score will be applied to the 5% Quality Withhold to calculate the Quality Withhold earn-back
 - Example: Total Quality Score of 80% would allow a DCE to earn back 80% of the 5% withhold, or 4%
- Quality paper was recently updated (v2): <https://innovation.cms.gov/media/document/dc-model-quality-methodology-paper>

Table 2-1. Summary Table of Quality Measures Used by Year

Measure	PY2021	PY2022	PY2023	PY2024	PY2025	PY2026	Method of Data Submission
ACR	X	X	X	X	X	X	CMS calculates from claims
UAMCC	X	X	X	X	X	X	CMS calculates from claims
DAH	Y	Y	Y	Y	Y	Y	CMS calculates from claims
Timely Follow-Up	—	Z	Z	Z	Z	Z	CMS calculates from claims
CAHPS	—	X	X	X	X	X	DCE contracts with CMS-approved CAHPS vendor

— = not applicable

X = All DCE Types

Y = High Needs Population DCEs only

Z = Standard and New Entrant DCEs only

Table 2-2. Portions of Quality Withhold Tied to Reporting and Performance by Year

PY	Quality Withhold	Portion Tied to Reporting	Portion Tied to Performance
PY2021*	5%	4%	1%
PY2022	5%	4%	1%
PY2023	5%	0%	5%
PY2024	5%	0%	5%
PY2025	5%	0%	5%
PY2026	5%	0%	5%

*= April–December 2021

Global and Professional Direct Contracting Model: Quality Measurement Methodology (for PY2022 only—1/1/2022–12/31/2022)

Revision: v 2.0

Prepared for:

Centers for Medicare & Medicaid Services (CMS)

Center for Medicare and Medicaid Innovation (The Innovation Center)

Seamless Care Models Group

7500 Security Boulevard, N2-13-16

Baltimore, MD 21244-1850

Prepared by:

RTI International

3040 East Cornwallis Road

Research Triangle Park, NC 27709

DC Quality.....



- Continuous Improvement (CI)/Sustained Exceptional Performance (SEP):
 - In PY2023–PY2026, a set of CI/SEP criteria will be used to determine the portion of the Quality Withhold that a DCE is eligible to earn back
 - DCE’s Total Quality Score will be applied to the full 5% Quality Withhold if the DCE meets the CI/SEP criteria in the PY, whereas it will be applied to only half of the Quality Withhold (2.5%) if the DCE does not meet the CI/SEP criteria in the PY
- High Performers Pool (HPP):
 - In PY2023–PY2026, DCEs that meet the CI/SEP criteria will be eligible for inclusion in the HPP. The HPP provides an opportunity for a bonus payment based on quality performance or improvement. The portion of the Quality Withhold that is not earned back by DCEs that meet the CI/SEP criteria will fund the HPP

DC Quality.....



- Issues for discussion:
 - Fewer measures than previous models- do you view this as a positive or a negative?
 - More emphasis on CAHPS measures and efficiency measures looking at the overall balance of the measure set – what is your feedback on this approach?
 - Benchmarks- do you feel you have enough information on quality benchmarks to be able to estimate your performance? (to be posted June 2022)
 - Continuous Improvement/Sustained Exceptional Performance Criteria- do you have concerns with this requirement? Is this sustainable?
 - High Performers Pool- do you view this positively?
 - What other concerns do you have regarding the quality approach in DC?

Other Topics.....



- **What other topics are on your mind or that you want to discuss?**
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Thank you!