

# Direct Contracting Learning Discussion



**The program will begin at 2:00 pm ET.**

# Introductions



## **David Pittman**

David is senior policy advisor at NAACOS where he assists the government affairs team in its legislative and regulatory affairs work, including its work around Direct Contracting. He also works on NAACOS's communications efforts.



## **Dave Ault**

Dave is counsel at Faegre Drinker Biddle & Reath LLP where he advises clients on a range of CMS issues including those related to value-based payment. Dave regularly draws on his extensive experience at HHS and CMS, including his tenure leading the Next Generation ACO Model and working as part of the Medicare Shared Savings Program leadership team.

# .....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. **Please display your full name on Zoom so that speakers and other participants know who is on the call**
4. Today's program is being recorded
  - Recordings will be posted to NAACOS's stand-alone [Direct Contracting page](#)

# Agenda.....



1. Welcomes and housekeeping
2. A couple of teed-up topics
  - a) Continued discussion on the interaction between Periodic Interim Payments (PIP) and fee reductions
  - b) Changes to the PY2022 Participation Agreement
  - c) Discussion on preliminary benchmarks
  - d) Efforts around voluntary alignment
3. Open forum and discussion

# .....NAACOS Direct Contracting Resources

- Stand-alone [webpage](#) with CMS and NAACOS resources
- In-depth [analysis](#) of Direct Contracting
- [Summary](#) of Direct Contracting Financial Specifications
- [Overview](#) of Quality Measurement Methodology
- [Frequently Asked Questions](#) on 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](mailto:DirContractListServ@naacos.com)
- NAACOS staff is also available at [DirectContracting@naacos.com](mailto:DirectContracting@naacos.com)

# Key Dates.....



- **Dec. 10** – 2022 Preliminary Benchmark Reports sent to DCEs
- **Dec. 10** – December payments released
- **Dec. 17** – Q1 Alternative Payment Arrangement reports sent to DCEs with prospective capitation and APO payment amounts
- **Dec. 17** – 2022 financial guarantee amounts shared with DCEs
- **Dec. 17** – Updated alignment estimates sent to DCEs
- **Dec. 31** – Deadline to elect provisional reconciliation for PY 2022
- **Dec. 31** – Deadline to elect prospective plus alignment and PVA
- **Jan. 1** – Deadline to have fee reduction agreements signed for PY2022

# Continued Discussion on PIP/Fee Reductions



- In our November meeting, there were issues raised regarding Medicare's Periodic Interim Payments (PIP) and fee reductions
- If facilities receive Medicare reimbursement through the Periodic Interim Payments program, then they are not subject to claims reduction
- Since that last call, NAACOS received a couple of questions and stories about this being an issue
- **How are other DCEs being impacted?**

# .....Changes to PY2022 Participation Agreements

- CMS earlier this month released the PY2022 Participation Agreements
  - As expected, the changes are minimal and mostly non-substantive in nature
  - Those agreements are available on the [NAACOS website](#)
- A few key changes include:
  - Allowing a High Needs Population DCE to select to participate in the model as a New Entrant DCE or Standard DCE after the first performance year
  - Allowing the DCE to enter into provider contracts and cost-sharing support arrangements at the entity level
  - Allowing DCEs to update core service area during a performance year.
  - Update the quality measures. Specifically, DCEs must report CAHPS Survey measures beginning in 2022. For 2022, CAHPS will be "pay for reporting" for all DCEs.
  - Update the lookback period if CMS determines that experience from CY 2021 is not sufficiently predictive for PY 2022 when calculating the Primary Care Capitation (PCC) Payment, the Advanced Payment Option (APO) Amount, and the Total Care Capitation (TCC) Payment.
- Changes are summarized in [this NAACOS resources](#)
- **What are DCEs' reaction to changes?**



# Other Topics.....



- Preliminary benchmarks should have been delivered last week
  - Do others care to share reactions to what they're seeing?
- One question submitted in advance asked about voluntary alignment
  - What are DCEs' experience with voluntary alignment?
  - What tools are you using to encourage beneficiary engagement?

# Other Topics.....



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