## Update on the Oncology Care Model Where are we now?

#### Leah Ralph, Director of Health Policy ACCC 2017 POLICY AND PROVIDER INSIGHTS SUMMIT August 16, 2017



The leading education and advocacy organization for the multidisciplinary cancer team

#### **ACCC MEMBER PRACTICES**

Andrews & Patel Associates, P.C. Arizona Cancer Center **Clearview Cancer Institute** Essex Oncology of North Jersey Lancaster Cancer Center, Ltd. Nebraska Cancer Specialists Stuart Oncology Associates The START Center for Cancer Care Ventura County Hematology & Oncology Specialists Abington Hematology Oncology Associates, Inc. Advocate Christ Medical Center Cancer Institute Albert Einstein Healthcare Network, Cancer Center **Alliance Cancer Specialists** Arizona Oncology Associates, PC Association of Northern California Oncologists Banner MD Anderson Cancer Center Bon Secours Cancer Institute, St. Mary's Hospital Cancer & Hematology Centers of Western Michigan Cancer Centers of Southwest Oklahoma, LLC **Cancer Specialists of North Florida** Carol G. Simon Cancer Center at Overlook Hospital Medical Center Carolina Blood & Cancer Care Associates Centra Health, Alan B Pearson Regional Cancer Center **CHRISTUS St. Vincent Regional Cancer Center Cleveland Clinic Foundation**, Taussig Cancer Center Emerald Coast Oncology and Hematology Associates, PA **Epic Care** 

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# **Commercial Payers**

- Aetna
- Blue Cross Blue Shield of Michigan/Blue Care Network
- BlueCross BlueShield of South Carolina
- Capital BlueCross, Inc.
- Cigna Life & Health Insurance Company
- EmblemHealth
- Health Alliance Plan
- Health Care Services
  Corporation

- Highmark, Inc.
- Priority Health
- SummaCare
- The University of Arizona Health Plans
- UPMC Health Plan
- VIVA Health, Inc.



### **OCM Timeline**

Milestone	Date
OCM Program start date	July 1, 2016
Baseline Feedback Report (Jan-March 2016)	Sept 2016
OCM Practice Transformation Plan	Sept 30, 2016
Q1 and Q2 OCM Quality & Clinical Data reporting	Feb 28, 2017
Q1 Feedback Report and claims-level data (July-Sept 2016)	March 2017
Q2 Feedback Report and claims-level data (Oct-Dec 2016)	June 2017
Performance Period 1 concludes (Episodes ending June 30)	June 30, 2017
Q3 Feedback Report and claims-level data	Sept 2017
Deadline to elect 2-sided risk for Jan 1, 2018 = Advanced APM = no MIPS	Oct 1, 2017
Performance Period 1 Beneficiary Attribution	Oct-Nov 2017
Q4 Feedback Report and claims-level data	Dec 2017
Performance Period 2 concludes (Episodes ending Dec 31)	Dec 31, 2017



# **OCM Timeline (cont.)**

Milestone	Date
Performance Period 3 commences	Jan 2, 2018
Initial PBP Reconciliation Performance Period 1	Feb 2018
1 <sup>st</sup> PBP Reconciliation True Up Performance Period 1	Aug 2018
2 <sup>nd</sup> PBP Reconciliation True Up Performance Period 1	Feb 2019
Performance Period 1 PBP payment	March 2019



## **Upcoming Milestones**

- August 31stCost Resource Utilization (CRU) survey deadline<br/>(Jul 2016 Jun 2017)
- August 31<sup>st</sup> OCM Participants receive Q3 feedback reports (Jan – Mar 2017)
- October 1<sup>st</sup> Deadline to elect two-sided risk and avoid MIPS in 2018
- **October 12<sup>th</sup>** Quarterly clinical and quality data reporting deadline
- October 26<sup>th</sup> CMS provides list of beneficiaries attributed to OCM to practices for reconciliation



#### **One Year In: Where Are We?**

- Practices now have Q3 claims data and, unlike Q1 and Q2, it's cumulative (much more user friendly). However, **understanding the claims data** – let alone using it for quality improvement – continues to be #1 challenge for OCM practices.
- Practices are largely still in the dark about target prices we won't know historical baseline costs until CMS does PBP calculations in <u>February 2018</u>. Very few practices understand how their actual claims are tracking against target prices (i.e. how they'll do on PBPs).
- There have been some automation improvements to the OCM registry in which OCM participants enter clinical and quality data, but this is still largely a manual, laborious process. Much of the **data required is not readily accessible** by OCM participants (in their EMR or otherwise). Most OCM practices have identified someone to do data extraction and entry, but this required many practices to hire a data administrator (which may or may not have been budgeted).



## **One Year In: Where Are We? (cont.)**

 In October, CMS will release the list of beneficiaries they have attributed to the OCM for each practice. Will this list be consistent with what practices have been recording as their OCM beneficiaries (and billing episodes for)? Early discoveries from some quarterly claims data review suggests there will be discrepancies – potentially significant discrepancies. We may see MEOS payment recoupment at PBP reconciliation in early 2018.



#### **OCM Data Files**

# Files	Content
1	Beneficiary Level file - lists members attributed to practice
3	Part A - Hospital Inpatient claims files
2	Part A - Home Health Services claims files
3	Part A - Skilled Nursing Facility claims files
2	Part A - Hospice claims files
2	Part B - Physician/Carrier Claims files
2	Part B - Durable Medical Equipment Claims files
3	Part B - Hospital claims files
1	Part D - Drug Claims file
1	Substance Abuse and Mental Health (SAMH) Excluded Claims Summary



## Some Key Takeaways

- This model is time consuming, labor intensive and requires staffing up.
- Quality measure and clinical data reporting requirements are overbearing, and require manual collection and reporting to OCM registry.
- Claims data files are difficult to interpret and not organized to inform practices about episodes.
- Little to no understanding if practices are on target to earn any PBP.
- Pricing methodology is complex, many covariates, one big black box.
- Deferred gratification; we wont have first glimpse into PBP calculations until Feb. 2018.
- So much of practices' success in the OCM is based on the EMR platform they use.
- Not just about the services the practices are providing, but success hinges on practices' ability to *report* the requirements in the format CMS is requesting.



#### **ACCC OCM Collaborative**



ACCC Oncology Care Model Collaborative Workshop & Reception at the ACCC 34th National Oncology Conference

October 17 - 18, 2017 Nashville, Tennessee



