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# Enhancing Oncology Model

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# Summary

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- Applications due to CMMI 10/10/22
- Components
  - Care requirements
  - **TOTAL** cost of care
  - Billing and patient measures
- Commitment expected March 2023?

# OCM to EOM

Component	Oncology Care Model (OCM)	Enhancing Oncology Model (EOM)
Transformation	13-point IOM Care plan	13-point IOM plan + specific tool for HRSN + specific ePRO system + interface of ePRO data to EMR
Monthly Enhanced Oncology Services (MEOS)	\$160/month for eligible patients	\$70/month (or \$100/month for dual eligible) for patients with 7 cancers
Eligible patients	All cancers	7 higher risk cancers only
Patient voice	Patient satisfaction survey	Patient satisfaction survey + SDOH/HRSN + ePRO
Risk	Upside and downside	Downside only & no risk to CMMI
Target benchmarks	Not known prior to commitment	Not known prior to commitment & Base is 5 years prior & Changes every 6 months

# Care requirements

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- 24/7/365 access to patient's EMR
- Patient navigation
- Care plan with 13 IOM components
- Treatment guidelines
- Identify social needs
- Gradual implementation ePROs

1- 2023 Medicare Impact Model based on Medicare Physician Fee Schedule Preliminary Rule

# EOM compared to ASCO/COA OMH/APC4

Practice	EOM	APC4
24/7 access	X	X
Symptom Triage		X
Navigation	X	X
Care Plan	X	X
Survivorship plan	X	X
Psychosocial assess	X	X
Financial counseling		X

# EOM compared to ASCO/COA OMH/APC4

Practice	EOM	APC4
Rx by national standards	X	Value Pathway compliance
Clinical trial access		X
Identify social needs	X	Assess health equity
e-PROS	Gradual implementation	Planned
Utilize data for QI	X	X
Certified EHR	X	X
Advance care planning	X	X
Chemotherapy safety		X

# What patients think

Component	OMH/APC4	OCM/OMH	Non-OCM	% Diff
Overall	91.8	91.6	85.8	106.9%
Timeliness	87.4	86.8	80.1	108.8%
Thoroughness	95.4	95.4	87.8	108.7%
Communications	89.5	89.7	82.3	108.9%
Friendliness	97.1	96.9	94.7	102.4%
Provider rating	94.6	94.2	91.5	103.1%

# Financial Risk

Path	Options	Details
EOM	Risk Arrangement 1	Does not qualify as an AAPM PBP Max = 4% (Total cost of care) PBR Max = 2% (Total cost of care)
EOM	Risk Arrangement 2	AAPM eligible? PBP Max = 12% (Total cost of care) PBR Max = 6% (Total cost of care)
And there is MIPS		
MIPS		9% potential bonus or penalty (CPT charges)

EOM:

5% of high and low total cost of care cases are excluded. (WinsORIZATION)

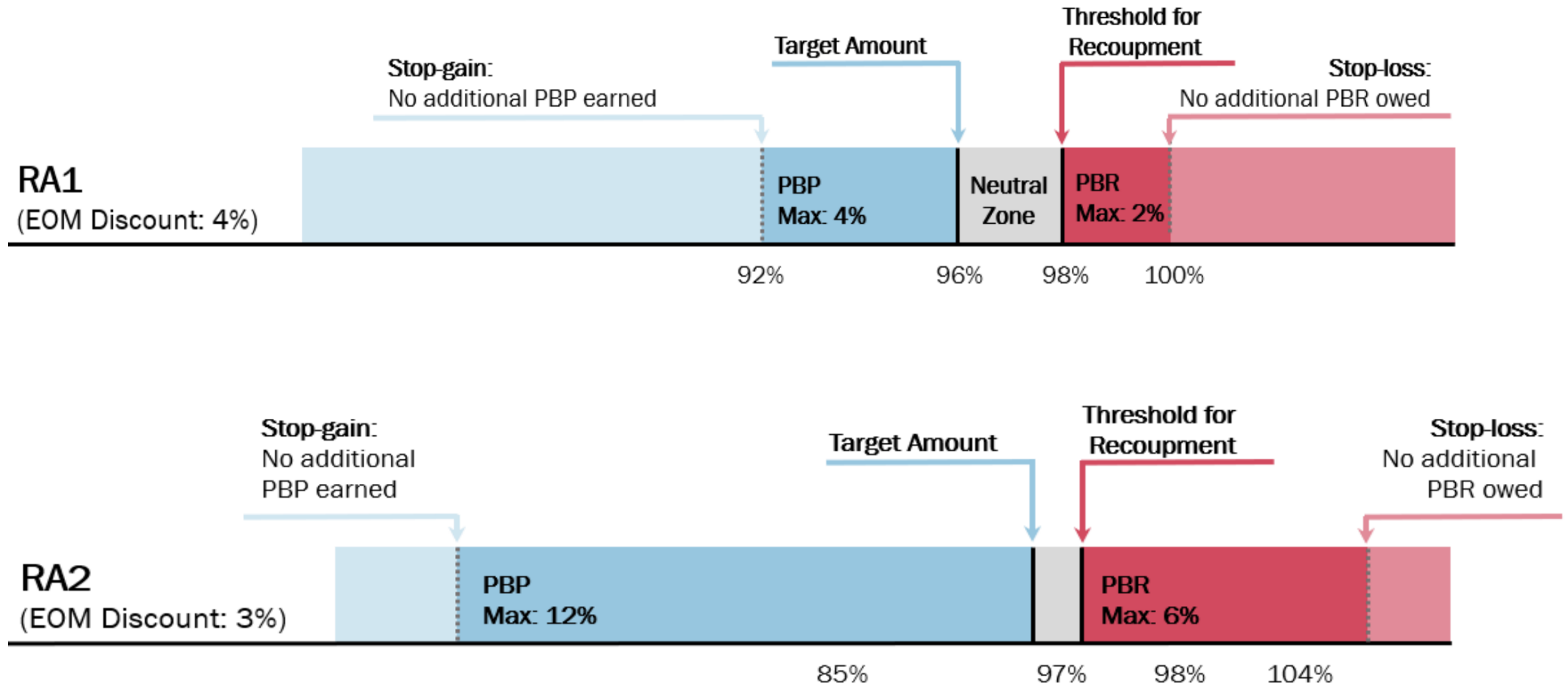
AAPM thresholds: 75% of Part B Payments through AAPM OR 50% of Part B patients

Safe zones for each risk arrangement

98% threshold for recoupment



# Per CMMI



# Example – Part 1 PBP

Practice A's benchmark amount for this performance period is **\$1,000,000**

**Under Risk Arrangement 1 (RA1), this benchmark amount corresponds to:**

Target amount	\$960,000
Threshold for recoupment	\$980,000
Neutral zone	Between \$960,000 and \$980,000
Stop-gain (4% of benchmark amount)	\$40,000
Stop-loss (2% of benchmark amount)	\$20,000

**Actual expenditures for Scenario 1: \$925,000**

# Example – Part 2 PBP

Savings below target amount: **\$960,000 - \$925,000 = \$35,000**

Practice A's savings are less than the stop-gain (\$40,000), so the PBP amount is based on these savings.

**PBP amount calculation:**

$$\begin{array}{ccccccc}
 \$35,000 & & 0.75 & & 1.03 & & 0.98 \\
 \text{(Savings relative} & \times & \text{(PBP performance} & \times & \text{(Geographic} & \times & \text{(Sequestration} \\
 \text{to target amount)} & & \text{multiplier)} & & \text{adjustment)} & & \text{adjustment)}
 \end{array}$$

Final PBP amount:

**\$26,497**

**Actual expenditures for Scenario 1: \$925,000**

# The message from HHS?

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A crumpled white paper ball is centered on the slide. The paper is heavily wrinkled and folded, creating a textured, three-dimensional appearance. The lighting is soft, casting a subtle shadow on the surface below the ball.

**Ok. As long as  
you don't lose  
\$0.01.**

# Adjusters for 7 cancers – 1 through 20

Risk adjusters	Breast	Chronic Leukemia	Lung	Lymphoma	Multiple Myeloma	Prostate	Small intestine / colorectal
Intercept	\$36,246.00	\$47,074.00	\$59,225.00	\$55,606.00	\$58,445.98	\$38,004.00	\$27,129.00
Male_Age_18_64	NA	\$5,164.04	-\$437.25	\$5,575.48	\$6,429.16	\$2,437.47	\$4,906.10
Male_Age_65_69	NA	\$5,412.25	\$1,500.91	\$5,004.31	\$3,196.49	Reference	\$980.94
Male_Age_70_74	NA	\$4,778.45	\$1,555.80	\$5,464.07	\$1,495.58	\$164.55	\$992.00
Male_Age_75_79	NA	\$3,150.32	\$883.45	\$4,561.51	-\$965.80	\$12.21	-\$267.98
Male_Age_80	NA	-\$2,353.76	-\$534.37	\$757.26	-\$10,179.47	-\$1,783.73	-\$2,844.80
Female_Age_18_64	NA	\$2,154.69	-\$434.26	\$1,306.34	\$2,068.05	NA	\$3,990.64
Female_Age_70_74	NA	-\$776.39	-\$335.54	-\$648.14	-\$2,555.78	NA	-\$513.68
Female_Age_75_79	NA	-\$1,630.68	-\$1,289.21	-\$1,387.86	-\$4,122.97	NA	-\$1,787.32
Female_Age_80	NA	-\$5,985.59	-\$2,817.51	-\$6,103.72	-\$13,707.41	NA	-\$4,416.19
Age_18_64	\$2,186.77	NA	NA	NA	NA	NA	NA
Age_70_74	-\$1,507.79	NA	NA	NA	NA	NA	NA
Age_75_79	-\$2,921.12	NA	NA	NA	NA	NA	NA
Age_80	-\$6,853.21	NA	NA	NA	NA	NA	NA
Male	\$4,313.14	NA	NA	NA	NA	NA	NA
Cancer Surgery	\$10,005.00	\$15,938.00	\$7,700.10	\$13,060.00	\$7,542.99	\$8,519.71	\$14,893.00
Bmt - Allogeneic	NA	NA	NA	\$60,645.78	\$62,568.49	NA	NA
Bmt - Autologous	NA	NA	NA	\$51,916.70	\$29,045.99	NA	NA
Bmt (Allogeneic + Autologous)	NA	\$48,086.00	NA	NA	NA	NA	NA

# Adjusters for 7 cancers - 21 through 41

Risk adjusters	Breast	Chronic Leukemia	Lung	Lymphoma	Multiple Myeloma	Prostate	Small intestine / colorectal
Episode Length 183-184	\$659.26	\$2,747.89	\$1,104.71	\$969.45	\$2,322.32	\$1,594.74	\$248.82
Clinical Trial	NA	\$9,162.47	NA	\$6,719.61	\$3,996.26	\$407.55	\$1,485.41
Radiation Therapy	\$5,537.08	\$13,088.00	\$720.43	\$5,915.78	\$19,832.67	\$9,834.34	\$5,957.52
Institutionalized	-\$2,183.73	-\$280.56	-\$3,698.74	-\$1,292.16	-\$6,145.83	\$831.28	\$120.22
Full_Dual	\$16,458.00	\$15,439.00	\$5,825.49	\$11,695.08	\$36,937.03	\$11,148.00	\$3,463.35
Part_D_Lis	\$15,505.00	\$14,055.00	NA	\$10,302.85	\$35,920.66	NA	\$2,842.35
Part_D_No_Lis	\$7,277.82	\$5,389.15	NA	\$3,553.60	\$28,398.28	NA	\$1,113.55
Part_D (Lis + No Lis)	NA	NA	\$1,522.72	NA	NA	\$807.30	NA
Obesity	\$4,224.43	\$1,027.76	\$4,385.54	\$5,473.93	\$4,337.59	\$2,209.05	\$2,782.36
Copd	\$465.93	\$2,793.59	NA	\$601.82	\$156.75	\$2,126.20	\$164.62
Hypertension	\$456.41	\$409.63	\$368.80	\$1,038.55	\$643.15	\$659.65	\$767.21
Hematologic	\$1,353.46	\$3,999.71	\$200.92	\$967.47	\$2,106.30	\$2,157.17	\$2,598.97
Autoimmune	\$1,397.01	\$1,042.22	NA	\$150.99	\$2,405.04	\$1,851.39	\$2,730.17
Endocrine	\$629.97	\$1,141.21	\$1,246.68	\$1,381.47	\$215.99	\$1,967.39	\$1,115.86
Heart	\$1,637.81	\$650.93	\$188.57	\$1,797.38	\$906.97	\$1,795.64	\$630.20
Dementia	NA	NA	NA	NA	NA	\$271.55	NA
Hcc_New	\$2,439.53	\$1,083.90	\$2,882.62	-\$1,560.96	\$2,515.88	\$2,465.48	\$5,690.85
Hcc Costly Count 1	\$2,061.68	\$2,355.54	\$830.48	\$2,064.95	\$2,949.95	\$2,133.22	\$2,048.43
Hcc Costly Count 2	\$3,841.97	\$4,657.89	\$2,299.66	\$4,744.10	\$5,498.98	\$3,819.73	\$3,721.88
Hcc Costly Count 3	\$4,828.96	\$7,112.30	\$3,048.85	\$7,568.74	\$6,588.87	\$4,341.70	\$4,149.78
Hcc Costly Count 4 +	\$6,521.58	\$11,201.00	\$6,637.65	\$12,029.74	\$11,546.41	\$7,159.06	\$7,848.33

# Adjusters for 7 cancers – 42 through 55

Risk adjusters	Breast	Chronic Leukemia	Lung	Lymphoma	Multiple Myeloma	Prostate	Small intestine / colorectal
Prior Chemo 1 - 61 Days	\$1,020.47	-\$1,280.83	\$3,895.40	NA	-\$1,850.92	\$5,565.81	\$7,053.53
Prior Chemo 62 - 730	-\$3,427.69	-\$10,685.00	-\$2,190.80	NA	-\$3,782.56	\$2,393.00	\$6,297.23
Prior Chemo 1 - 30 Days	NA	NA	NA	-\$4,967.14	NA	NA	NA
Prior Chemo 31 - 60 Days	NA	NA	NA	-\$25,502.00	NA	NA	NA
Prior Chemo 61 - 90 Days	NA	NA	NA	-\$32,359.00	NA	NA	NA
Prior Chemo 91 - 120 Days	NA	NA	NA	-\$31,468.00	NA	NA	NA
Prior Chemo 121 - 150 Days	NA	NA	NA	-\$19,127.00	NA	NA	NA
Prior Chemo 151 - 180 Days	NA	NA	NA	-\$21,146.00	NA	NA	NA
Prior Chemo 181 - 270 Days	NA	NA	NA	-\$15,733.00	NA	NA	NA
Prior Chemo 271 - 360 Days	NA	NA	NA	-\$7,874.22	NA	NA	NA
Prior Chemo 361 - 450 Days	NA	NA	NA	-\$4,855.14	NA	NA	NA
Prior Chemo 451 - 540 Days	NA	NA	NA	-\$5,774.68	NA	NA	NA
Prior Chemo 541 - 630 Days	NA	NA	NA	-\$5,151.65	NA	NA	NA
Prior Chemo 631 - 720 Days	NA	NA	NA	-\$5,750.59	NA	NA	NA

# Measures

- 6 quality measures

IP and ER Visits	Pain assessment and plan
Died in hospice $\geq$ 3 days	Depression screening/follow-up
Chemo last 14 days of life	Patient experience survey

- 7 clinical data elements

ICD10 code and date	Estrogen & Progesterone Receptor
Clinical status and date	HER2 Amplification
TNM Staging	Histology

- 6 sociodemographic data elements

Race	Preferred Language
Ethnicity	Gender Identity
Sex (Assigned at Birth)	Sexual Orientation

1- 2023 Medicare Impact Model based on Medicare Physician Fee Schedule Preliminary Rule



# Measures used in PBP

**Table 7. Example AQS Translated into PBP Performance Multiplier**

<b>AQS (% of maximum points)</b>	<b>PBP Performance Multiplier</b>
≥75% to 100%	100%
≥50% and <75%	75%
≥30% and <50%	50%
Less than 30%	0%

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# Compliance

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- Claims data
- Interviews with participants
- Interview with beneficiaries
- Chart audits
- Site visits
- Documentation requests

1- 2023 Medicare Impact Model based on Medicare Physician Fee Schedule Preliminary Rule

# Bo's Perspective

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- Transformative care delivery!
- Complicated
- Resources will be required
- Not-scalable
- Risky – particularly for smaller shops and non-OCM participants
- Inconsistent emphasis on health equity
- ePRO expectations could be burdensome
- BIG issue with AAPM thresholds

# To Learn More

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- Visit CMMI EOM site

<https://innovation.cms.gov/innovation-models/enhancing-oncology-model>

- Webinar recordings
  - Technical documents
  - Other resources
- Stay tuned for COA EOM Decision Model – Expected early 2023

# Questions/Discussion



Oncology Medical Home™



COMMUNITY ONCOLOGY  
PHARMACY ASSOCIATION

