



# MACRA and Beyond: What It Means to Cardiac Surgery

Michigan Society of  
Thoracic and  
Cardiovascular  
Surgeons

Boyne Mountain Resort

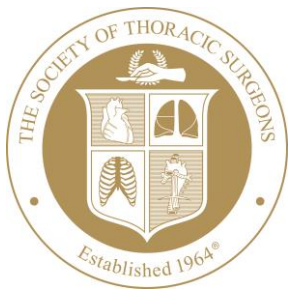
August 12, 2016

# Disclosures

Medtronic: North American Cardiac  
Surgery Advisory Board



**FEE For SERVICE**



# Our World After MACRA

Medicare Access and CHIP Reauthorization Act of 2015

APMs  
MIPS



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Medicare Access and CHIP Reauthorization Act of 2015

Revisions to Payment Policies under the Physician Fee Schedule and Other Revisions to Part B, CY 2017

G Codes  
GXXX1-5



APMs  
MIPS

# Our World After MACRA

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G Codes  
GXXX1-5

“Mandatory  
CABG  
Bundle”



APMs  
MIPS



# Medicare Payment Prior to MACRA

**Fee-for-service** (FFS) payment system, where clinicians are paid based on **volume** of services, not **value**.

## The Sustainable Growth Rate (SGR)

- Established in 1997 to **control the cost of Medicare payments** to physicians





# What is “MACRA”?

The **Medicare Access and CHIP Reauthorization Act of 2015**: bipartisan legislation signed into law on April 16, 2015.

MACRA reconfigures the physician payment landscape:

1. Repeals the Sustainable Growth Rate (SGR) formula
2. Changes the way that Medicare rewards physicians for value over volume
3. Streamlines multiple quality programs under the new **Merit-based Incentive Payment System (MIPS)**
4. Incentivizes the development of **Alternative Payment Models (APMs)**
5. Preserves global surgical payments

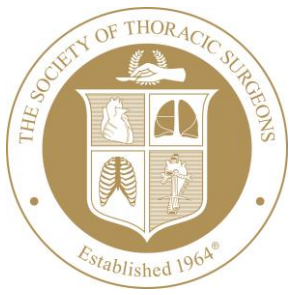




# MACRA Payment Plan

MACRA sets up a fork in the road for physician payment:





# MIPS Overview

**Consolidating existing quality incentive programs:**

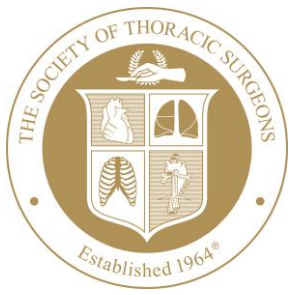
Physician Quality  
Reporting  
Program (**PQRS**)

Value-Based  
Payment  
Modifier

Medicare EHR  
Incentive  
Program

**MACRA** streamlines those programs into **MIPS**:

Merit-Based Incentive Payment System  
(**MIPS**)



# MIPS Score

**Score will factor in performance across four categories:**



**Quality**



**Resource  
use**



**Clinical  
practice  
improvement  
activities**



**Meaningful  
use of  
certified EHR  
technology**

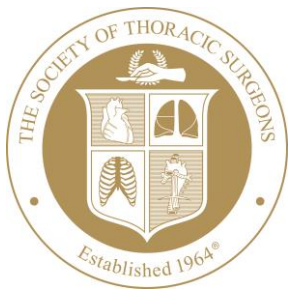


**MIPS  
Composite  
Performance  
Score**

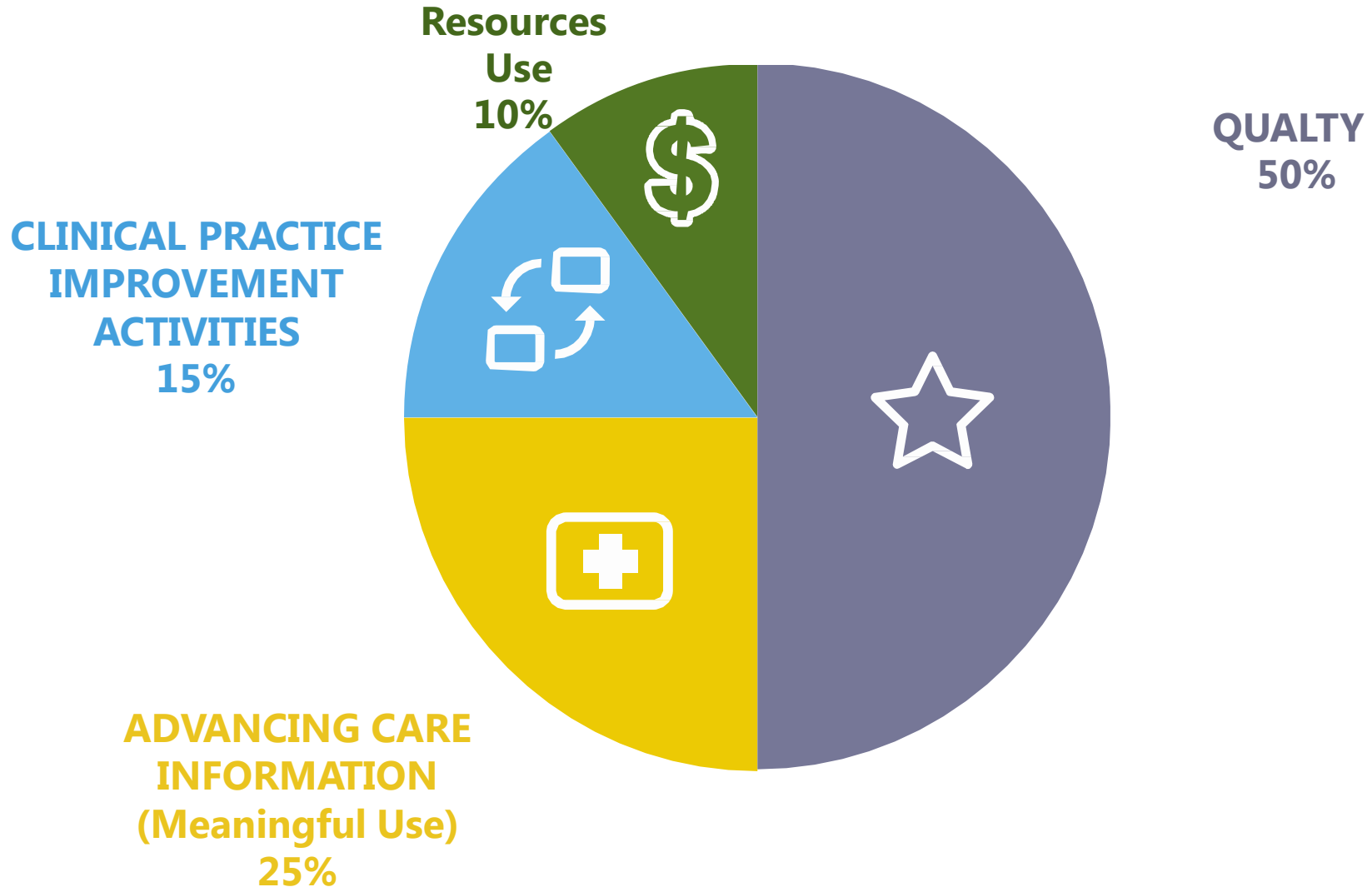
Quality: PQRS

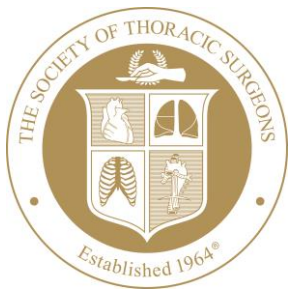
Resource use: VBM

CPIA: new, Registry

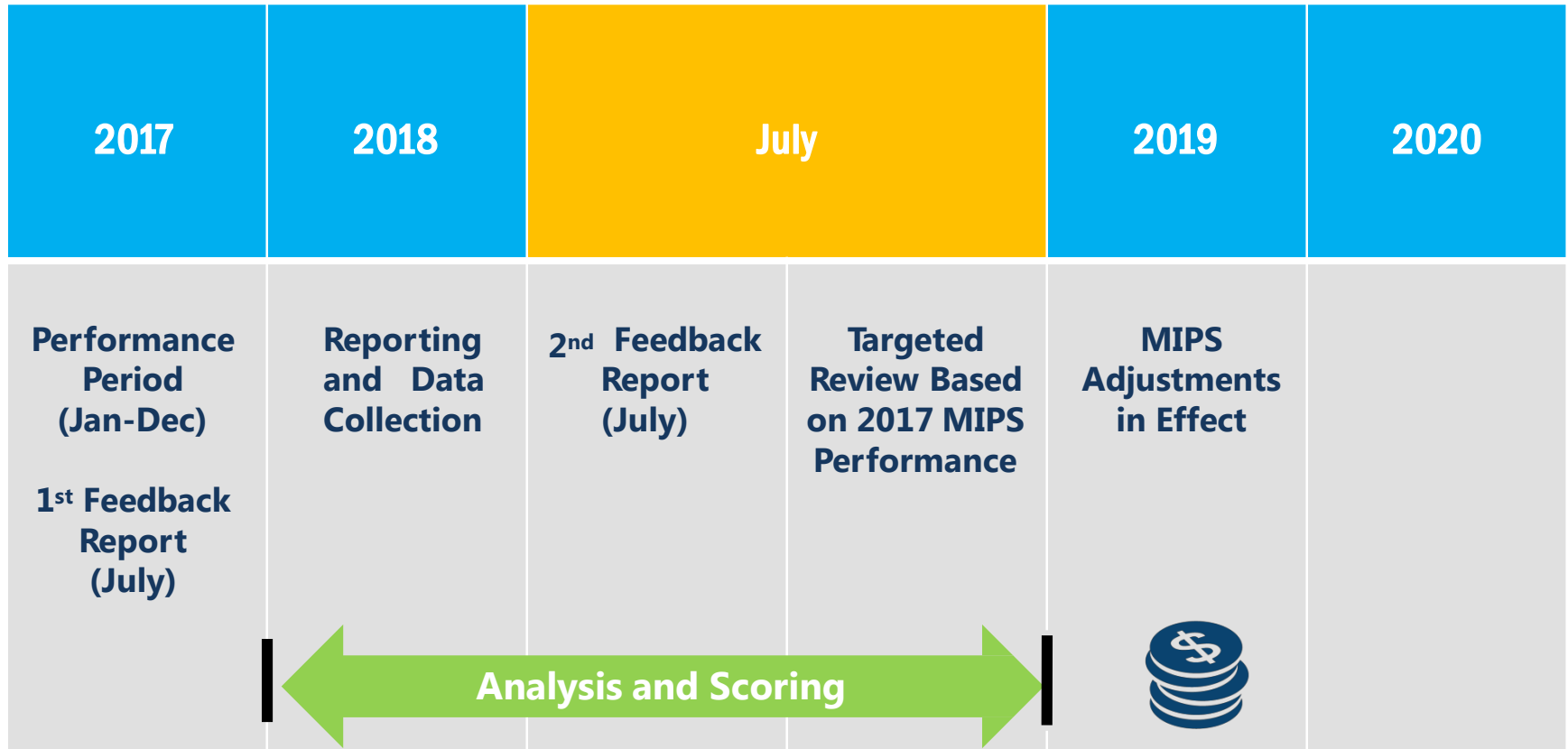


# Year 1 Performance Category Weights for MIPS





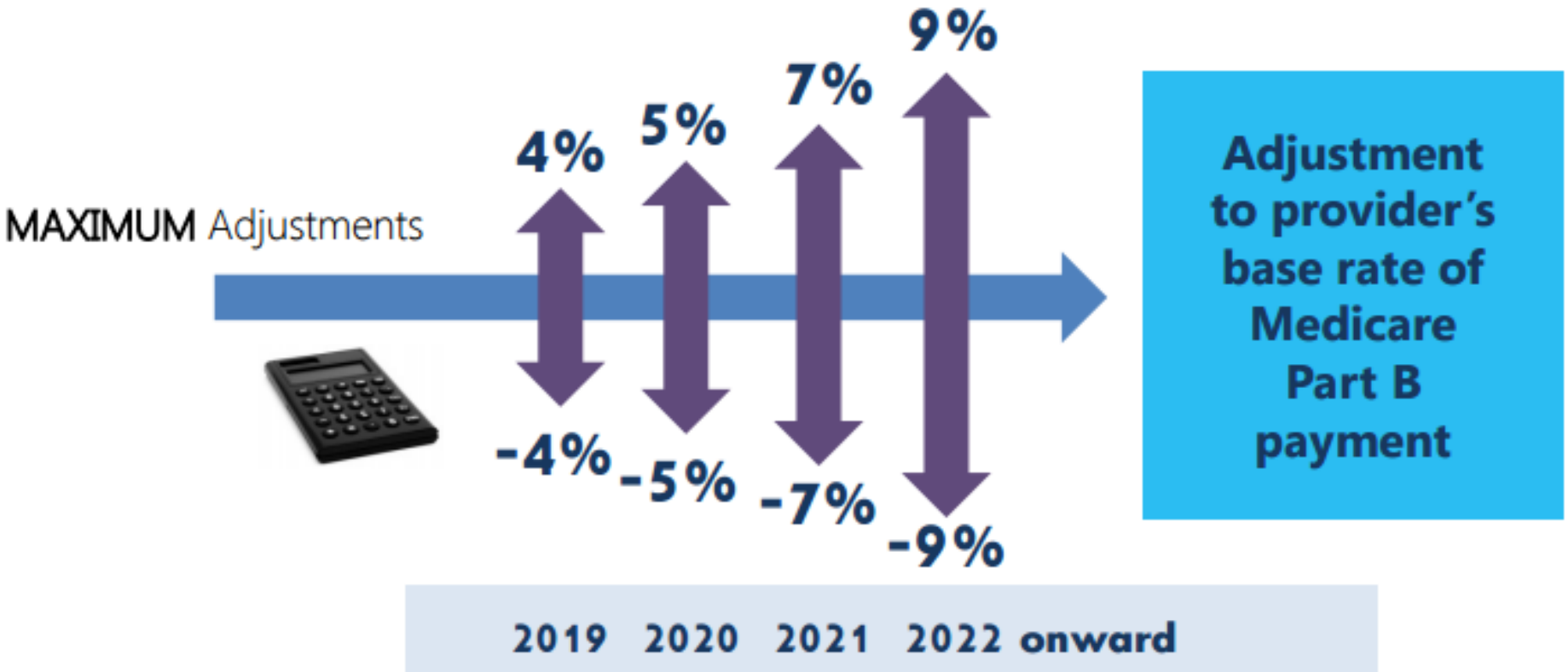
# Proposed Rule: MIPS Timeline

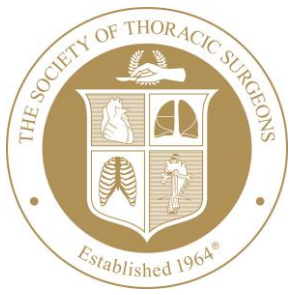




# MIPS Payment Adjustments

**MIPS bonuses and penalties are a zero-sum game:**






# MACRA aligns with goals previously set by Obama Administration

In January 2015, the Department of Health and Human Services announced **new goals for value-based payments and APMs in Medicare**

## *Medicare Fee-for-Service*

**GOAL 1:** **30%** 

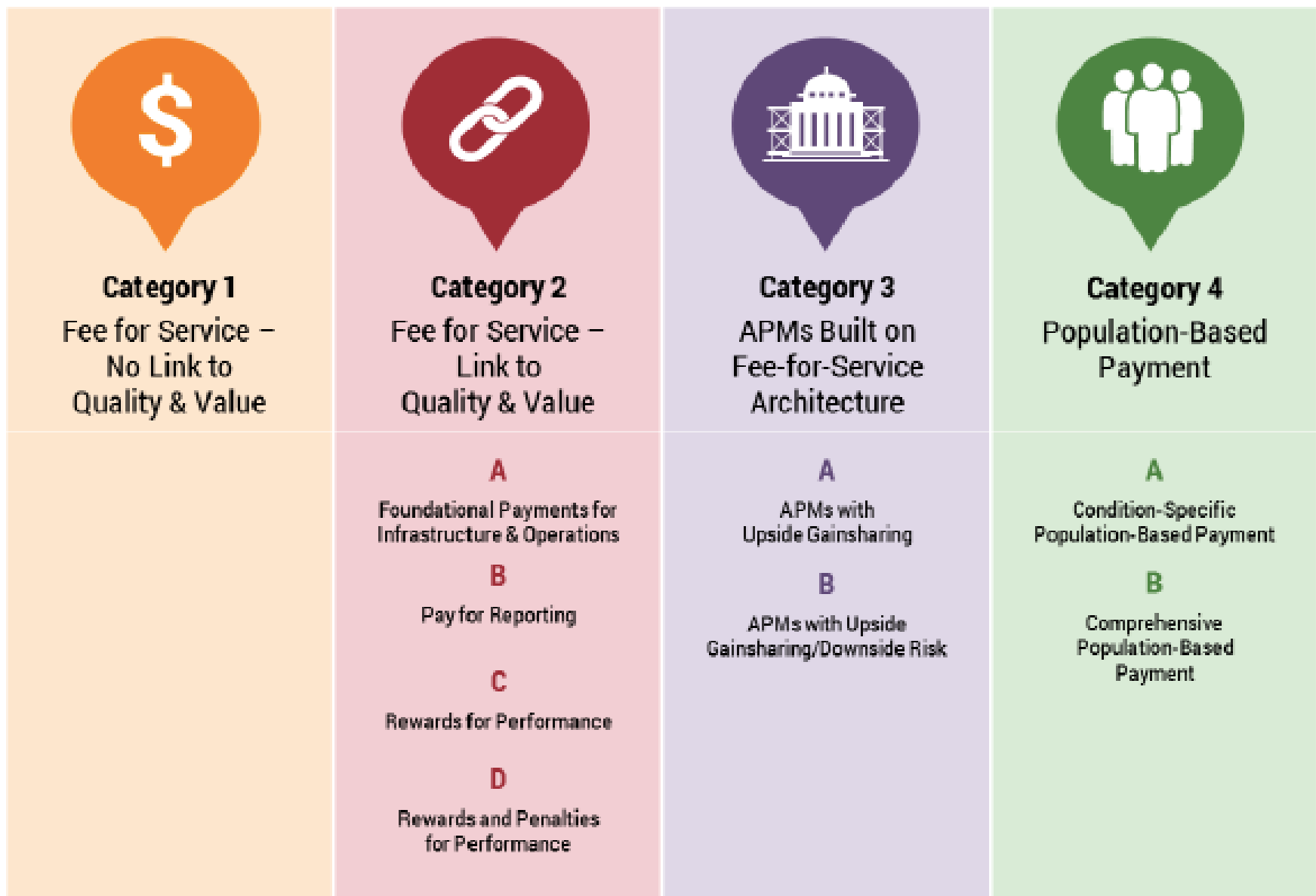
Medicare payments are tied to quality or value through **alternative payment models (categories 3-4)** by the end of 2016, and 50% by the end of 2018

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**GOAL 2:** **85%** 

Medicare fee-for-service payments are **tied to quality or value (categories 2-4)** by the end of 2016, and 90% by the end of 2018

**Figure 1. APM Framework (At-A-Glance)**







# Alternative Payment Models

- *Purpose: Increase quality while reducing cost and resource use.*

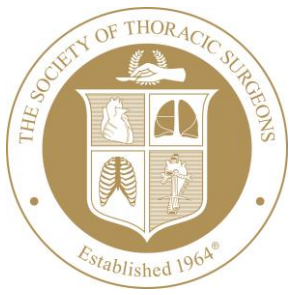
## MACRA Incentives Nudging Physicians into APMs:

1

Incentive payments to participate in Alternative Payment Models (5%)

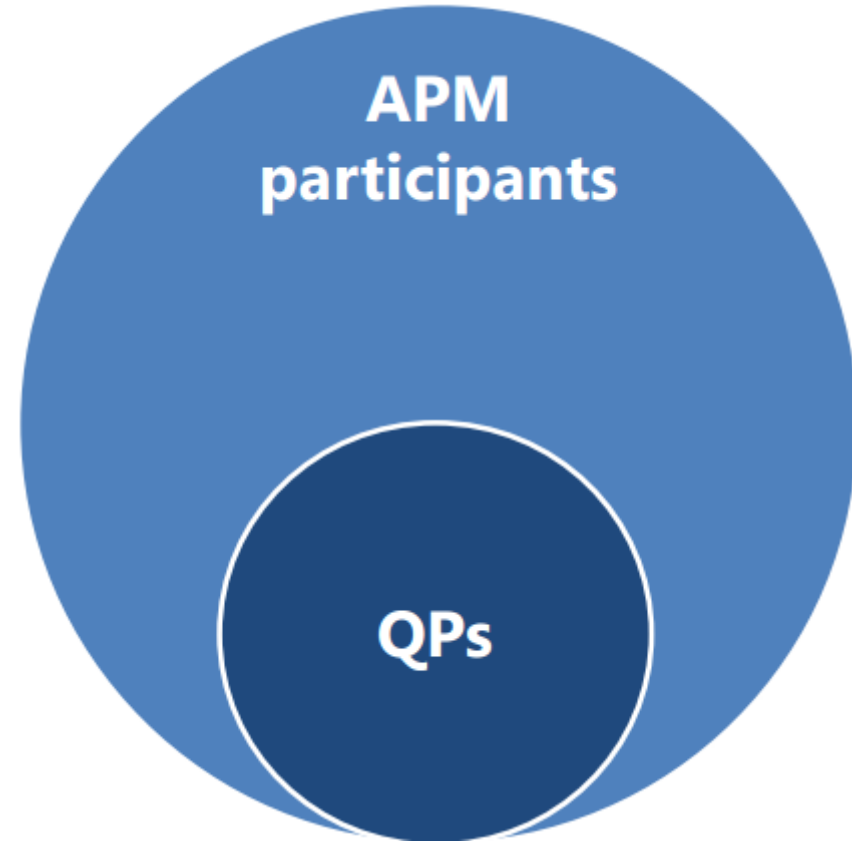
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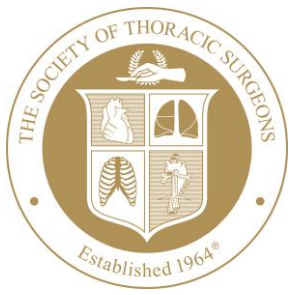
Ability to opt-out of other MACRA payment requirements (MIPS)



# APMs and MACRA

- Only a subset of APMs—those deemed “advanced APMs”— will be Qualified APM Participants (QPs) eligible for the 5% bonus under MACRA.
- All others fall under MIPS.

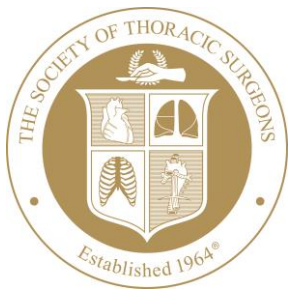




# Advanced Alternative Payment Model(s)



- **Advanced APMs meet the following criteria set forth in MACRA:**
  - ✓ Base payment on quality measures similar to those in MIPS
  - ✓ Use of certified EHR
  - ✓ Bear “more than nominal” risk



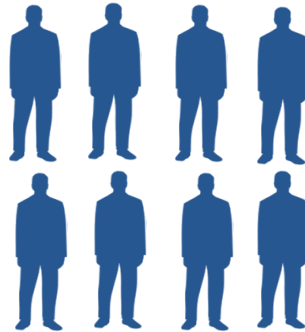
# Most clinicians will be subject to MIPS.

Subject to MIPS

Not in APM



In non-Advanced APM



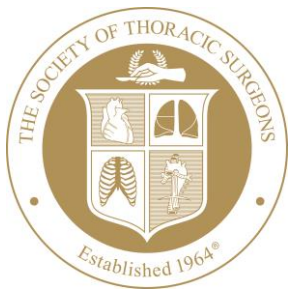
In Advanced APM, but not a QP



QP in Advanced APM



Some people may be in Advanced APMs but not have enough payments or patients through the Advanced APM to be a QP.



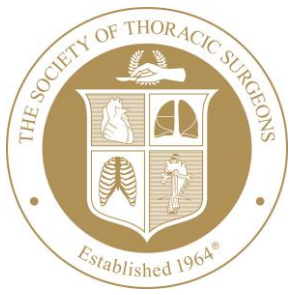
# Who Designs and Reviews an APM?

- Physician-focused Payment Model Technical Advisory Committee (PTAC)
- Health Care Payment Learning and Action Network (HCP-LAN)
- STS in process of becoming “Committed Partner”
- Physicians developing APMs:
  - Brandeis & American College of Surgeons
  - STS White Paper



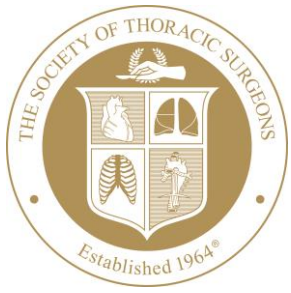
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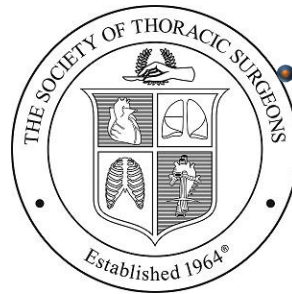
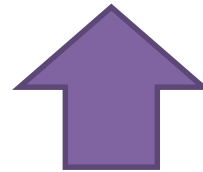


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**Physician Focused Payment Model  
Technical Advisory Committee  
(PTAC)**



Physician Focused Payment Model





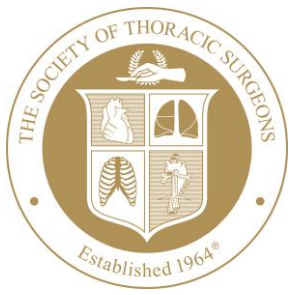
# G Codes.....GeeWhiz

- Key element of claims-based reporting: using codes that appropriately reflect the services furnished
- Most frequently recommended approach: report the existing CPT code for follow-up visits in the surgical package (CPT 99024 – Postoperative follow-up visit, normally included in the surgical package, to indicate that an E/M service was performed during a postoperative period for a reason(s) related to the original procedure.)



# G Codes.....GeeWhiz

- “To assist in determining appropriate coding for claims-based reporting, we added a task to the RAND contract for developing a model to validate the RVUs in the PFS
- Modified RAND contract to include development of G-codes that could collect data about post-surgical follow-up visits on Medicare Claims
- This could be included in model for validating RVUs”



# G Codes.....GeeWhiz

RAND recommended a set of time-based post-operative visit codes that could be used for reporting care provided during the post-operative period

Applied to a REPRESENTATIVE Sample of Surgical Pts.-Time/Intensity Values



# G Codes.....GeeWhiz

**TABLE 9: Proposed Global Service Codes**

|                                   |       |   |
|-----------------------------------|-------|---|
| <b>Inpatient</b>                  | GXXX1 | Inpatient visit, typical, per 10 minutes, included in surgical package                                    |
|                                   | GXXX2 | Inpatient visit, complex, per 10 minutes, included in surgical package                                    |
|                                   | GXXX3 | Inpatient visit, critical illness, per 10 minutes, included in surgical package                           |
| <b>Office or Other Outpatient</b> | GXXX4 | Office or other outpatient visit, clinical staff, per 10 minutes, included in surgical package            |
|                                   | GXXX5 | Office or other outpatient visit, typical, per 10 minutes, included in surgical package                   |
|                                   | GXXX6 | Office or other outpatient visit, complex, per 10 minutes, included in surgical package                   |
| <b>Via Phone or Internet</b>      | GXXX7 | Patient interactions via electronic means by physician/NPP, per 10 minutes, included in surgical package  |
|                                   | GXXX8 | Patient interactions via electronic means by clinical staff, per 10 minutes, included in surgical package |

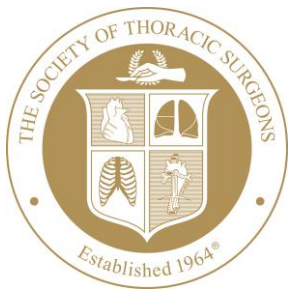
**WOULD BE APPLIED TO ALL SURGICAL PROCEDURES!**



# G Codes.....GeeWhiz

What does this mean?

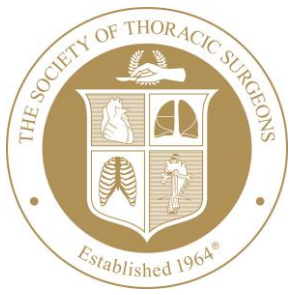
- In MACRA, we were able to block dissolving of 90 day Globals
  - CMS didn't like that
    - They have gone outside of legislative directives to est G codes, starting Jan 1 2017
    - STS is developing strategies with ACS to challenge this Rule and its implementation (Doc Caucus, ACS, Individual lobbying efforts with Congress,etc)
  - Education efforts to inform STS members



# CMS Proposed Rule for “Mandatory Bundle for CABG”

- Under Social Security Act (Section 1115A) authorizes the Innovation Center-CMS to test innovative payment models
- Fee for Service: separate payments to providers for services
- Amount of payments dependent on Volume; providers may not have incentives to invest in quality-improvement and/or care-coordination services—as result, care may be fragmented or unnecessary
- The Goal of Proposed EPMs: improve quality of care provided to beneficiaries in episodes while reducing spending through Financial Accountability

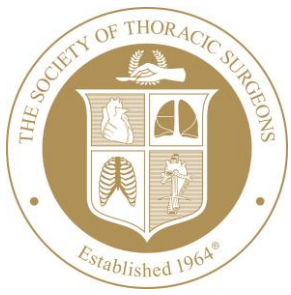
Episode Payment Models=EPMs



# CMS Proposed Rule for “Mandatory Bundle for CABG”

## Proposed EPMs:

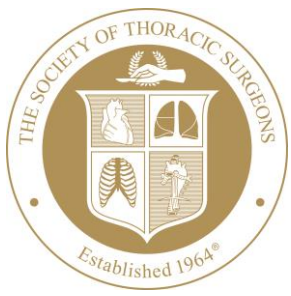
- Acute Myocardial Infarction (AMI)
- Coronary Artery Bypass Graft (CABG)
- Surgical hip/femur fracture treatment (SHFFT) excluding lower extremity Joint Replacement
- PURPOSE: TEST whether the proposed models would benefit Medicare beneficiaries by improving the coordination and transition of care, encourage more provider investment in infrastructure and redesigned care processes for higher-quality and more efficient service delivery
- Propose to test EPMs for 5 years: July 1,2017-December 31, 2021



# Directive to Hospitals for Care Redesign

- Increasing post-hospitalization follow-up and medical mgt. for patients
- Coordinating across the inpatient and post-acute care spectrum
- Conducting appropriate discharge planning
- Improving adherence to treatment or drug regimens
- Reducing readmissions and complications during post-discharge period
- Managing chronic diseases and conditions related to the EPM episodes
- Choosing the most appropriate post-acute care setting
- Coordinating between providers and suppliers such as hospitals, physicians, and post acute-acute care providers





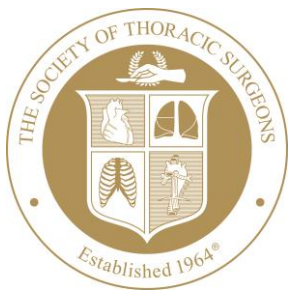
# Proposed Models allow CMS to gain Additional Experience with Episode-Payment Approaches

- Variance in historic care and utilization patterns
- Patient population and Care patterns
- Variance in roles within the local markets
- Variance in volumes of services
- Variance in levels of access to financial community
- Variance in levels of population and health-care provider density
- Variations in use of different categories of post-acute care providers



# Summary of Payment

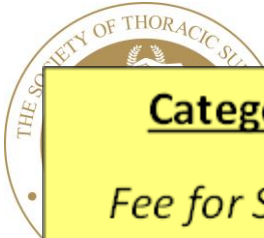
- Test will run for 5 years; first yr: July 1,2017
- CMS proposes to continue paying providers usual Medicare FFS payments
- After completion of performance year, the “Medicare claims payments for services furnished to the beneficiary during the episode, based on claims data, would be combined to calculate actual episode payment”
- Such actual payment would be reconciled against est EPM quality-adjusted target price
- If +, would be paid to participant: reconciliation payment. If -, would require repayment from hospital “with episodes ending in 2<sup>nd</sup> quarter of performance yr 2 of EPM”



# Summary of Payment cont.

- EPM participants' quality performance also would be assessed at reconciliation; each participant would receive composite quality score and quality category.
- EPM participants that achieve quality category as “acceptable” or higher are eligible for payment.
- Proposed measures for CABG model: All-Cause, 30 Day, Risk-Standardized Mortality Rate following CABG (NQF #2558)





**Category 1**

*Fee for Service:  
No link to Quality  
& Value*

**Category 2**

*Fee for Service:  
Link to Quality &  
Value*

- A. Foundational Payments for Infrastructure & Operations
- B. Pay for Reporting
- C. Rewards for Performance
- C. Rewards & Penalties for Performance

Merit-based Incentive Payment System (new fee-for-service)

**Category 3**

*APMs Built on Fee-for Service Architecture*

- A. APMs with Upside Gainsharing
- B. APMs with Upside Gainsharing/Downside Risk

STS Whitepaper + ACS/ Brandeis Project

Mandatory CABG Bundled payment

**Category 4**

*Population-Based Payment*

- A. Condition-Specific Population-Based Payment
- B. Comprehensive Population-Based Payment

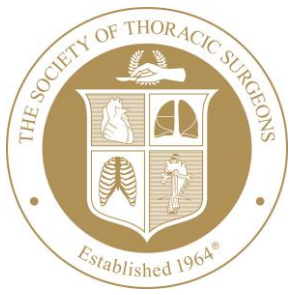
CMS-funded Health Care Payment Learning and Action Network (HCP-LAN)

CMS Bundled Payment for Care Initiative

$$6 - 3 = 6$$

Questions?





# The Society of Thoracic Surgeons

## MACRA Briefing

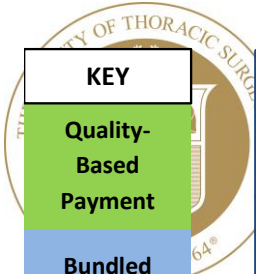
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# Where Does Industry Fit?

- What risk models could Providers (Hospitals/Physicians) and Medtronic develop?
- How would up-side and down-side risk or results be evaluated?
- Who would evaluate and track such results? Medtronic vs Hospital Systems?
- How would such relationships fit under existing Regulatory criteria? What are such legal restrictions or opportunities? Could they be modified under the modifications of the Bill?





**KEY**

- Quality-Based Payment
- Bundled Payment
- Population-Based Payment

Existing →

Potential - ->

