

Calendar Year (CY) 2019 End-Stage Renal Disease (ESRD) Prospective Payment System (PPS) Final Rule: ESRD Quality Incentive Program (ESRD QIP)

January 15, 2019

Presenters:

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About Today's Call

 CMS will provide information about the CY 2019 ESRD PPS Final Rule (CMS-1691-F) published on November 14, 2018.

• Information is offered as an informal reference and does not constitute official CMS guidance. CMS encourages stakeholders, advocates, and others to refer to Final Rule CMS-1691-F in the <u>Federal Register</u>.





Agenda

Topic	Speaker
Welcome & Introduction	James Poyer, MS Program Director Division of Value, Incentives & Quality Reporting (DVIQR) Quality Measurement & Value Incentives Group (QMVIG) Center for Clinical Standards & Quality (CCSQ) Centers for Medicare & Medicaid Services (CMS)
Overview of the ESRD QIP & Operationalizing Meaningful Measures	Delia Houseal, PH.D., MPH ESRD QIP Program Lead DVIQR/QMVIG/CCSQ, CMS
ESRD QIP Section of the CY 2019 PPS Final Rule (CMS-1691-F)	Delia Houseal, PH.D., MPH ESRD QIP Program Lead DVIQR/QMVIG/CCSQ, CMS
Helpful Tips & Resources	Julia Venanzi, MPH ESRD QIP Program Systems & Communications DVIQR/QMVIG/CCSQ, CMS





Today's Objectives

- Identify programmatic changes beginning in PY 2021
- Introduce PY 2022 requirements
- Discuss the impact of the final rule on facilities, providers and patients
- Identify resources for support or further details





Acronyms used in this Presentation

Acronym	Definition
BSI	Bloodstream Infection (CDC)
CDC	Centers for Disease Control and Prevention (HHS)
CMS	Centers for Medicare & Medicaid Services (HHS)
CY	Calendar Year
ESRD	End-Stage Renal Disease
ESRD QIP	End-Stage Renal Disease Quality Incentive Program
HHS	U.S. Department of Health & Human Services
ICH CAHPS	In-Center Hemodialysis Consumer Assessment of Healthcare Providers and Systems
MedRec	Medication Reconciliation for Patients Receiving Care at Dialysis Facilities
MIPPA	The Medicare Improvements for Patients and Providers Act of 2008

Acronym	Definition
NHSN	National Healthcare Safety Network (CDC)
OGC	Office of General Counsel (CMS)
PAMA	The Protecting Access to Medicare Act of 2014
PPPW	Percentage of Prevalent Patients Waitlisted
PPS	Prospective Payment System
PSC	Performance Score Certificate
PY	Payment Year
SHR	Standardized Hospitalization Ratio
SRR	Standardized Readmission Ratio
STrR	Standardized Transfusion Ratio
SWR	First Kidney Transplant Waitlist Ratio for Incident Dialysis Patients
TPS	Total Performance Score





Welcome & Introduction

James Poyer, MS

Program Director

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Overview of the ESRD QIP & Operationalizing Meaningful Measures

Delia Houseal, PH.D., MPH

ESRD QIP Program Lead

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Group Center for Clinical Standards & Quality,

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ESRD QIP Statutory Requirements:

The Secretary of the Department of Health & Human Services (HHS) is required to create an ESRD QIP and method for assessing total performance of each facility based on standard measurements and weights during a defined performance period

The ESRD QIP is linked to the bundled ESRD prospective payment system (PPS) through the passage of the Medicare Improvements for Patients and Providers Act of 2008 (MIPAA).

Section 1881(h) of the Social Security Act, as added by Section 153(c) of MIPPA

- Program intent: Promote patient health by providing a financial incentive for renal dialysis facilities to deliver high-quality patient care
- Section 1881(h):
 - Authorizes payment reductions if a facility does not meet or exceed the minimum Total Performance Score (TPS) as set forth by CMS
 - o Allows CMS to apply payment reductions of up to 2%

The ESRD QIP has progressively matured in scope and structure since its formation.

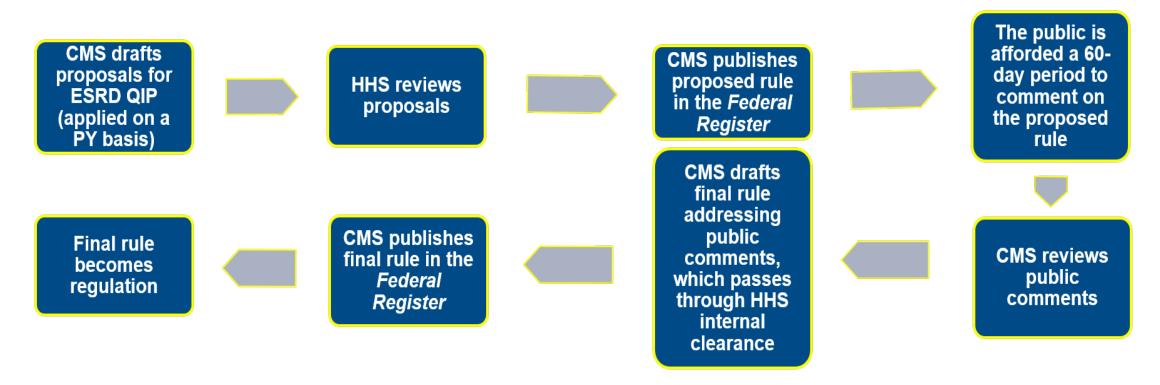
The Protecting Access to Medicare Act of 2014 (PAMA) added section 1881(h)(2)(A)(iii) to the Social Security Act:

 Starting in 2016, ESRD QIP must include measures specific to the conditions treated with oral-only drugs (and those measures are required to be outcome-based, to the extent feasible).





ESRD QIP Rule Development



Your comments matter!





The Proposed Rule...530 Public Comments

Stakeholder insights influenced CMS changes from the proposed rule

Most significantly, public comments impacted:

- Rationale for finalizing PPPW and not SWR
- Revisions to weighting approach
- Rationale for the new weight redistribution approach

Comments and details are available online







CY 2019 ESRD PPS Final Rule - ESRD QIP Summary

The rule supports the ESRD QIP's effort to align with the Meaningful Measures Initiative's objectives

- Removes four measures beginning in PY 2021
- Adds two new measures beginning in PY 2022
- Restructures domains and weights used to calculate each facility's Total Performance Score (TPS) beginning in PY 2021
- Expands the National Healthcare Safety Network (NHSN) dialysis event data validation study over two years beginning in PY 2021
- Converts the CROWNWeb validation study into a permanent program feature beginning in PY 2021
- Delays reporting requirements for new facilities beginning in PY 2021





Meaningful Measures Initiative

OBJECTIVES

- Are patient-centered and meaningful to patients
- Are relevant and meaningful to providers
- Remove measures where performance is already very high and that are low-value
- Provide significant opportunity for improvement
- Align across programs and/or with other payers



Promote Effective Communication & Coordination of Care

Meaningful Measure Areas:

- Medication Management
- Admissions and Readmissions to Hospitals
- Transfer of Health Information and Interoperability

Promote Effective Prevention & Treatment of Chronic Disease

Meaningful Measure Areas:

- Preventive Care
- Management of Chronic Conditions
- Prevention, Treatment, and Management of Mental Health
- Prevention and Treatment of Opioid and Substance Use Disorders
- Risk Adjusted Mortality

Work with Communities to Promote Best Practices of Healthy Living

Meaningful Measure Areas:

- Equity of Care
- Community Engagement

Make Care Affordable

Meaningful Measure Areas:

- Appropriate Use of Healthcare
- Patient-focused Episode of Care
- Risk Adjusted Total Cost of Care

Make Care Safer by Reducing Harm Caused in the Delivery of Care

Meaningful Measure Areas:

- Healthcare-associated Infections
 - Preventable Healthcare Harm

Strengthen Person & Family Engagement as Partners in their Care

Meaningful Measure Areas:

- Care is Personalized and Aligned with Patient's Goals
- End of Life Care according to Preferences
- Patient's Experience of Care
- Patient Reported Functional Outcomes





Meaningful Measures: Improving Outcomes, Reducing Burden

"At CMS the overall vision is to reinvent the Agency to put patients first. We want to partner with patients, providers, payers, and others to achieve this goal. We aim to be responsive to the needs of those we serve."

- Administrator Seema Verma Centers for Medicare & Medicaid Services

Through Meaningful Measures, CMS seeks to address the following cross-cutting measure criteria:

- Eliminating disparities
- Tracking measurable outcomes and impact
- Safeguarding public health
- Achieving cost savings
- Improving access for rural communities
- Reducing burden

CMS believes that these will lead to:

- Improved outcomes for patients, their families, and healthcare providers
- Reduced burden and costs for clinicians and providers
- Increased operational efficiencies





ESRD QIP Section of the CY 2019 PPS Final Rule (CMS-1691-F)

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ESRD QIP Program Lead

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Beginning in PY 2021: Update

Factors for Measure-Removal

When removing a measure from the ESRD QIP, CMS will cite one or more of the following factors as justification for the measure's removal:

Factor 1.	Measured performance among the majority of ESRD facilities is so high and unvarying that
	meaningful distinctions in improvements or performance can no longer be made (for example, the
	measure is topped-out).

- Factor 2. Performance or improvement on the measure does not result in better or the intended patient outcomes.
- **Factor 3.** A measure no longer aligns with current clinical guidelines or practice.
- Factor 4. A more broadly applicable (across settings, populations, or conditions) measure for the topic or a measure that is more proximal in time to desired patient outcomes for the particular topic becomes available.
- Factor 5. A measure that is more strongly associated with desired patient outcomes for the particular topic becomes available.
- Factor 6. Collection or public reporting of a measure has (or could) lead/s to negative or unintended consequences.
- **Factor 7**. It is not feasible to implement the measure specifications.
- **Factor 8.** The costs associated with a measure outweigh the benefit of its continued use in the Program.





Beginning in PY 2021: Change Four reporting measures removed

MEASURE	RATIONALE
Healthcare Personnel Influenza Vaccination	Factor 1
Pain Assessment and Follow-Up	Factor 1
Anemia Management	Factor 1
Serum Phosphorus	Factor 5

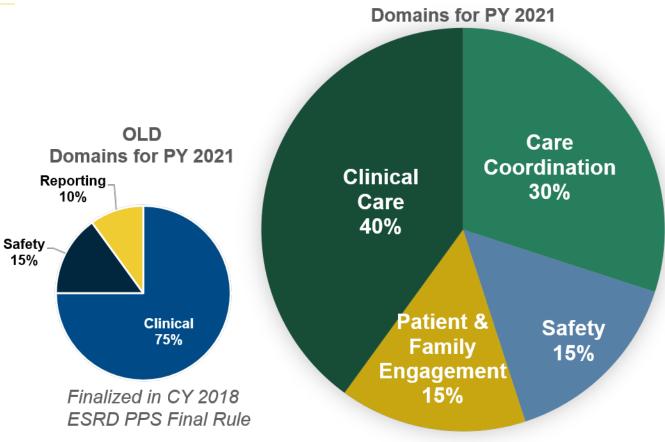




PY 2021: Domains and Weighting

Reweights domain structure and measures to account for measure removals and emphasize clinical outcomes

- Four domains: To be eligible for a TPS, a facility must receive a score on at least one measure in two out of the four domains
- Clinical Care and Care Coordination Domains have the highest weights because they are more focused on clinical outcomes. Clinical Care Domain has a higher weight over Care Coordination because it contains more measures
- Patient and Family Engagement Domain and the Safety Domain each contribute 15% to the TPS, as they are more focused on process measures









PY 2021 Measures: Overview

A facility must be eligible to receive a score on at least one measure in any two domains to receive a Total Performance Score (TPS)

30%

15%

15%

40%

Clinical Care Domain 40% of TPS

- Kt/V Dialysis Adequacy (comprehensive)
- VAT Measure Topic:
 - Standardized Fistula Rate
 - Long-Term Catheter Rate
- Hypercalcemia
- Standardized Transfusion Ratio (STrR)
- Ultrafiltration Rate reporting measure

Patient & Family Engagement Domain 15% of TPS

ICH CAHPS clinical measure

Care Coordination Domain 30% of TPS

- Standardized Readmission Ratio (SRR)
- Standardized Hospitalization Ratio (SHR)
- Clinical Depression Screening & Follow-Up reporting measure

Safety Domain 15% of TPS

- NHSN Bloodstream Infection (BSI)
- NHSN Dialysis
 Event reporting measure

TPS	Payment Reduction Percentage
56 to 100	No reduction
46 to 55	0.5% reduction
36 to 45	1.0% reduction
26 to 35	1.5% reduction
0 to 25	2.0% reduction





Beginning in PY 2021: New

Start for Data Reporting Timeframe

Provides new facilities a longer time period to become familiar with the processes for collecting and reporting ESRD QIP data before those data are used for purposes of scoring

 Delays the requirement for new facilities to begin reporting ESRD QIP data until the first day of the fourth month following the facility's CCN Open Date

EXAMPLE

First day of fourth month

IF CCN is assigned in the month of:

January 2019

S	М	Tu	W	Th	Fri	S
		1	2	3	4	5
6		8				
13		N C				
20					25	26
27	28	29	30	31		

"Open" date for reporting and measurement begins on...

May 2019

S	M	Tu	W	Th	Fri	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	





Beginning in PY 2021: Changes Data Validation

• CROWNWeb data validation becomes a permanent feature of the ESRD QIP

NHSN Dialysis Event validation study will use an expanded sample size:

• PY 2020: 35 Facilities, each providing 20 Records

PY 2021 Study: 150 Facilities, each providing 40 Records

PY 2022 Study: 300 Facilities, each providing 40 Records





Beginning in PY 2022: Summary

- New Medication Reconciliation for Patients Receiving Care at Dialysis Facilities (MedRec) measure
- New Percentage of Prevalent Patients Waitlisted (PPPW) measure
- Weights revised to account for addition of two new measures
- Continues expansion of number of facilities participating in the NHSN validation study

PY 2024: Proposed but <u>not</u> finalized in Final Rule

Proposed SWR measure





Beginning PY 2022: New Measure

Patients Receiving Care at Dialysis Facilities (MedRec)

Meaningful Measure Area = Medication Management

MedRec

The measure assesses how well a facility has appropriately evaluated a patient's medications – an important safety concern for the ESRD patient population, who typically take a large number of medications

- Measure steward is Kidney Care Quality Alliance
- Additional resources for this measure are included at the end of the presentation





Beginning PY 2022: New Measure Percentage of Prevalent Patients Waitlisted (PPPW)

Meaningful Measures Area = Equity of Care.

PPPW

This measure assesses the percentage of current patients at each dialysis facility who were on the kidney or kidney-pancreas transplant waitlist

 Additional resources for this measure are included at the end of the presentation



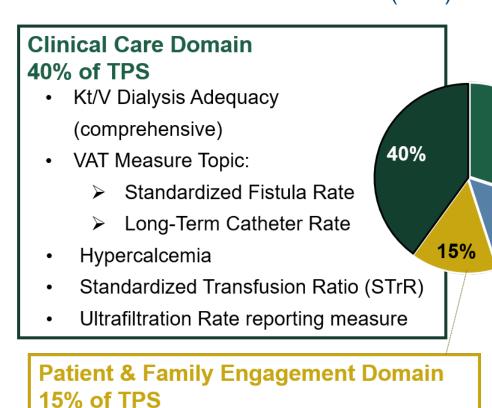


PY 2022 Measures: Overview

Reweights measures for scoring calculations to account for measure removals to achieve preferred emphasis on clinical outcomes. A facility must be eligible to receive a score on at least one measure in any two domains to receive a Total Performance Score (TPS).

30%

15%



Care Coordination Domain 30% of TPS

- Standardized Readmission Ratio (SRR) reporting measure
- Standardized Hospitalization Ratio (SHR)
- Clinical Depression Screening & Follow-Up

Percentage of Prevalent Patients Waitlisted (PPPW)

Safety Domain 15% of TPS

- NHSN Bloodstream Infection (BSI)
- NHSN Dialysis Event reporting measure
- Medication Reconciliation

TPS	Payment Reduction Percentage
Not defined	To be determined



ICH CAHPS clinical measure



Helpful Tips & Resources

Julia Venanzi, MPH

ESRD QIP Program Systems & Communications

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Center for Clinical Standards & Quality,

Centers for Medicare & Medicaid Services





Important ESRD QIP Dates

Payment Year	Performance Period	Achievement Score Comparison	Improvement Score Comparison
PY 2021	CY 2019	CY 2017	CY 2018
PY 2022	CY 2020	CY 2018	CY 2019

WHAT	WHEN
PY 2019 Performance Score Certificate (PSC)	Facilities must post through December 31, 2019
PY 2019 payment reductions applied	January 1 – December 31, 2019
PY 2020 Preview Period	Estimated: August, 2019
PY 2021 Performance Period	January 1 – December 31, 2019
PY 2020 PSC	Available mid December, 2019, facilities must post January 1 – December 31, 2020
PY 2020 payment reductions applied	January 1 – December 31, 2020
 CY 2020 ESRD PPS Rulemaking Proposed rule published 60-day comment period ends Final rule published 	 Estimated: June, 2019 Estimated: September, 2019 Early November, 2019



Resources

For Info on:	Go to:
Program (General)	ESRD QIP Section at CMS.gov
Measures	Technical Specifications for ESRD QIP Measures
	CMS ESRD Measures Manual
	In-Center Hemodialysis Consumer Assessment of Healthcare Providers and Systems
QualityNet	ESRD QIP Section at QualityNet.org
	QualityNet Secure Portal: Question & Answer Feature, Messaging, Scores, Facility Notices/Information, Certificates
Billing & Payment	ESRD Center on CMS.gov
Stakeholder Partners	Partners in ESRD Care Information & Links to stakeholders who compliment ESRD quality improvement (non-comprehensive)
Legislative	CY 2019 ESRD PPS Final Rule (CMS-1691-F) on Federal Register
	The Medicare Improvements for Patients and Providers Act of 2008

To reach us for comment: Contact the ESRD QIP Support Team via the ESRD QIP Q&A Tool or at ESRDQIP@CMS.HHS.gov 27





Question & Answer Session





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