# Accountable Care Organization Primary Care Flex Model (ACO PC Flex Model)

Model Overview Webinar

April 4, 2024

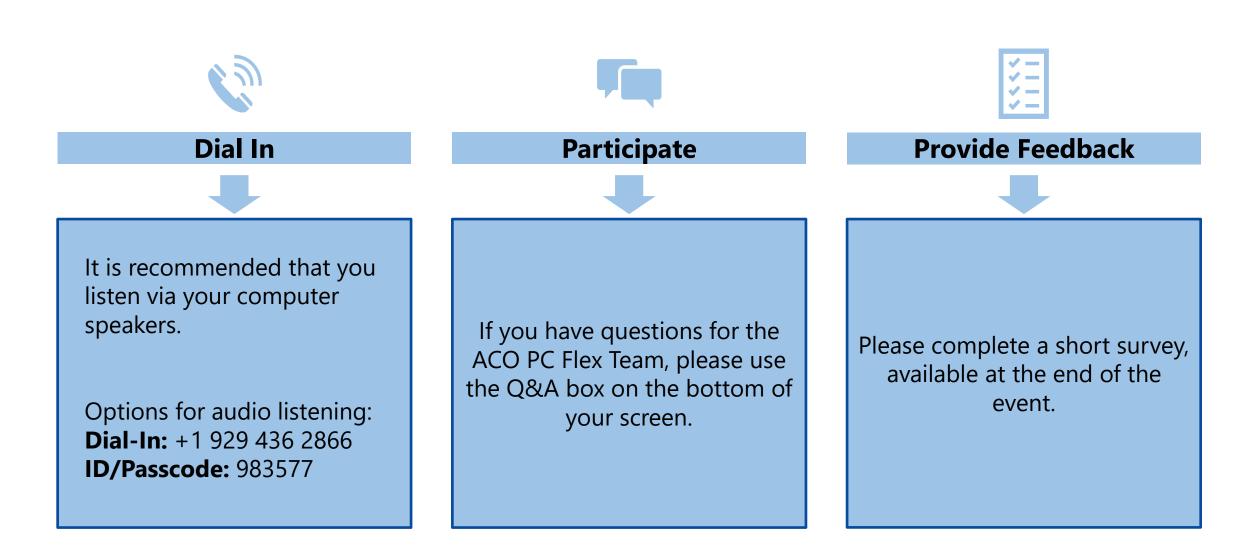


### Disclaimer

All information provided in the Model Overview Webinar is potentially subject to change.

When published, the Request for Application (RFA) will be the official source of information about ACO PC Flex Model details and the application process.

## Housekeeping & Logistics



Closed captioning is available on the bottom of the screen.

## Today's Presenters



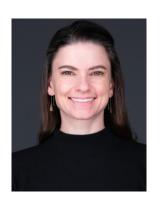
**Doug Jacobs**Chief Transformation
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Pauline Lapin
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## Agenda

1 Introductions and Welcome Remarks

5 Application and Next Steps

2 ACO PC Flex Model Overview

**6** Q&A

**3** Eligibility and Participation

**7** Closing and Resources

4 Payment Structure & Model Elements

### Zoom Poll #1



#### Please select what type of organization you represent.

- a. Accountable Care Organization (ACO)
- b. Federally Qualified Health Center (FQHC)
- c. Rural Health Clinic (RHC)
- d. Critical Access Hospital (CAH)
- e. Other Hospital
- f. Primary Care Provider
- g. Other type of Provider
- h. Community Organization
- i. Patient or Consumer Advocate
- j. Convener/Enabler
- k. Other

### Zoom Poll #2



## Which region are you calling in from today?

- a. Northeast
- b. Midwest
- c. South
- d. West

## **ACO PC Flex Model Overview**

### 3 Medicare Value-Based Care Priorities

- Established goal to have all Medicare FFS beneficiaries as part of an accountable care relationship by 2030.
- Growth of accountable care relationships can improve quality, increase savings for Medicare, and promote innovative delivery of services that meet patients' needs.





- From the provider's perspective, multi-payer alignment is critical and even aligning across CMS can help set the stage for broader alignment in our health care system.
- Alignment enables providers to focus on the most meaningful quality measures, allowing people with Medicare to get the highest quality care.

- For too long profound inequities have existed across our health care system. The design of value-based arrangements can be a key way to advance equity.
- Quality care for all is not possible without care that is also equitable.



### Primary Care Landscape

## Fragmented Care



Between 2000 and 2019, the percentage of beneficiaries **seeing 5 or more physicians annually** increased from 17.5% to 30.1%.<sup>1</sup>



In that same period, primary care physicians saw an 83% increase in the number of physicians they coordinated with on behalf of their patients.<sup>1</sup>

### Access Issues



Lack of access to primary care is associated with **lower life expectancy** and **poor health outcomes**.<sup>2</sup>



Access to primary care services are especially limited for **underserved populations**, including minoritized and rural populations.<sup>3,4,5</sup>

## FFS Payment System



Fewer than 30% of primary care providers say their practices are financially healthy.6



**FFS payments create incentives** for increased volume of short, office-based visits and procedures<sup>7</sup> as well as fragmented care, limited investment in critical assets like care teams, and limited electronic health record adoption.<sup>1,8</sup> FFS payments do not support whole-person care.

See Appendix for sources.

## Model Alignment with CMS Innovation Center Strategy

The ACO PC Flex Model was designed to align with the CMS Innovation Center's vision and strategic objectives.

#### **Innovation Center's Strategy: Vision and Objectives**



**2021 Strategy** White Paper is available at <a href="https://innovation.cms.gov/strategic-direction-whitepaper">https://innovation.cms.gov/strategic-direction-whitepaper</a>

**CMS defines health equity** as: The attainment of the **highest level of health** for all people, where everyone has a **fair and just opportunity** to attain their optimal health regardless of race, ethnicity, disability, sexual orientation, gender identity, socioeconomic status, geography, preferred language, or other factors that affect access to care and health outcomes.

## A New Model to Improve Access to High-Quality Primary Care

#### THE IMPORTANCE OF PRIMARY CARE



Primary care is the **foundation** of a high-performing health care system and **fundamental to improving** health outcomes



Higher levels of primary care spending improves **outcomes**, lowers **mortality rates** and improves **patient satisfaction**, while decreasing use of avoidable services like emergency room visits and hospitalizations

#### **ACO PC FLEX MODEL STRUCTURE**



New, **primary care payment** model for **low revenue ACOs** 



Tested within the **Medicare Shared Savings Program** 



Increased primary care funding and flexibility via two new payments mechanisms: One-time Advanced Shared Savings Payment and Monthly Prospective Primary Care Payments (PPCPs)



Empowers participants to utilize more innovative, team-based, person-centered and proactive approaches to care



Model features and implementation strategy designed to **promote health equity** 

### ACO PC Flex Model Goals



**Reduce disparities** in health care access to high quality primary care and outcomes



**Improve individuals' experience and access to care** while supporting primary care to deliver on key outcomes



**Lower costs** while enhancing **quality of care** for individuals in the Shared Savings Program



Empower participating ACOs and their providers to **use innovative care delivery approaches** that are team-based, person-centered and proactive – rather than visit-driven – to improve health outcomes and quality of care



**Grow participation** in the Shared Savings Program to reach CMS accountable care goals

## How the CMS Innovation Center is Supporting Primary Care

The CMS Innovation Center is investing significantly in testing models with multiple pathways to strengthen primary care, improve care coordination, and address social determinants of health.<sup>9</sup>











ACO Realizing Equity,
Access, and Community
Health
(ACO REACH)

Primary Care First (PCF)

## Making Care Primary (MCP)

States Advancing All-Payer Health Equity Approaches and Development (AHEAD)

ACO Primary Care Flex (ACO PC Flex)

- Encourages health care providers to come together to form an ACO
- Breaks down silos and delivers high-quality, coordinated care
- Addresses health disparities

- Supports primary care practices in managing their patients' health
- Enables primary care providers to offer a broader range of health care services that meet the needs of their patients
- Improves care management, community connections, and care integration
- Increases access to care and creates sustainable change in underserved communities
- Creates a new pathway to invest in primary care
- Provides Enhanced
   Primary Care Payments
- Uses a flexible framework of care transformation activities
- Focuses on improving primary care funding within ACOs
- Flexible, prospective payment within the Shared Savings Program
- Incentivizes the development of new, low revenue ACOs

2021 - 2026

2021 - 2026

2024 - 2034

2024 - 2034

2025 - 2029

## Key ACO Primary Care Flex Model Design Features



#### **Advanced Shared Savings**

Upfront funding to cover the costs of forming an ACO and / or administrative costs for required model activities



## **Prospective, Population-Based Payments**

Prospective, population-based payments for primary care combined with total-costof-care accountability within the Medicare Shared Savings Program



## **Regionally Consistent Rate for Primary Care**

The PPCP County Base Rate will not be based on the historical experience of the ACO, but on average county primary care spending



#### **Guaranteed Primary Care Revenue**

Enhanced amounts of Prospective Primary Care Payments (PPCPs) are not recouped by CMS to the extent they exceed positive regional adjustment and prior savings adjustments as part of performance-based risk arrangements



#### Guardrails

Specific policies and monitoring to ensure PPCP funds are used to support primary care



#### **Health Equity**

Multiple model design features to promote health equity

### Benefits of Participation in the ACO PC Flex Model

- 1 On-ramp to value-based care for new low revenue ACOs
- 2 Increased resources for most ACOs that participate
- 3 Increased **flexibility** in use of funds via prospective payments
- 4 Health equity advancement
- 5 Improved patient experience



## **Eligibility and Participation**

## Model Eligibility



Low Revenue
Accountable Care
Organizations
(ACOs)

Low revenue ACOs tend to be mainly made up of physicians and might include a small hospital or serve rural areas. These ACOs' total Medicare Parts A and B FFS revenue of its ACO participants is less than 35% of the total Medicare Parts A and B FFS expenditures for the ACO's assigned beneficiaries.



### **Eligible ACOs**

- ACOs designated as low revenue according to the definition above
- New entrants\*, renewals, or current
   ACOs that start a new agreement period within the Shared Savings Program
- ACOs participating in either the BASIC or ENHANCED tracks of the Shared Savings Program



### **Ineligible ACOs**

- ACOs not part of the Shared SavingsProgram
- ACOs designated as high revenue
- Participating ACOs may not simultaneously receive Advance Investment Payments (AIP) under the Shared Savings Program

### ACO PC Flex Participation

The ACO PC Flex Model will begin on January 1, 2025 and will run for five Performance Years (PYs) (2025-2029). The model will align with Shared Savings Program policies, including for provider eligibility and beneficiary assignment.

#### **Participation**

- ✓ ACOs participating in the ACO PC Flex Model will **jointly participate** in the Shared Savings Program
- ✓ The Prospective Primary Care Payment (PPCP) will be made **to ACOs** for most primary care services. ACOs will distribute payments to primary care practices
- ✓ PPCPs are in lieu of FFS reimbursement for all primary care providers, FQHCs and RHCs in the ACO
- ✓ Providers continue to submit claims. Medicare payment systems will "zero out" claims for primary care services billed
- ✓ Participants must select **prospective assignment** as part of their Shared Savings Program application
- ✓ Participation in the model is limited to 130 ACOs

## Overlaps with Other Medicare Programs

In general, CMS will not allow organizations and providers to simultaneously participate in the ACO PC Flex Model and another model or Medicare initiative that involves shared savings (aside from the Shared Savings Program), unless otherwise permitted by CMS. More information will be listed in the forthcoming Request for Applications (RFA)





Not eligible

PC Flex Model ACOs may not simultaneously receive Advance Investment Payments (AIP) under the Shared Savings Program.



CMS Innovation Center Shared Savings Initiatives & Other Prohibited Overlaps

Not eligible

Organizations enrolled in CMS Innovation Center Models that involve shared savings (ACO REACH) may not simultaneously participate in the ACO PC Flex Model. Overlap is also not allowed with the Primary Care First Model.



CMS Innovation Center
Non-Shared Savings Initiatives
& Other Allowed Overlaps

Eligible

PC Flex Model ACOs can participate in CMS Innovation Center initiatives that do not involve shared savings.

## **Payment Structure & Model Elements**

## Payment Approach Overview

## ONE-TIME ADVANCED SHARED SAVINGS PAYMENT

ACO PC Flex will provide a one-time shared savings advance of **\$250,000** to all PC Flex ACOs

Payments can be used to **fund start-up costs** of creating a PC Flex ACO, as well as administrative costs of required model activities



## **MONTHLY PROSPECTIVE PRIMARY CARE PAYMENTS (PPCPs)**

ACOs participating in the model will receive monthly PPCPs that **replace FFS reimbursement** for most primary care services

The PPCP is built from **four components:** 

County Base Rate

**Enhanced Amount** 

**Adjustments** 

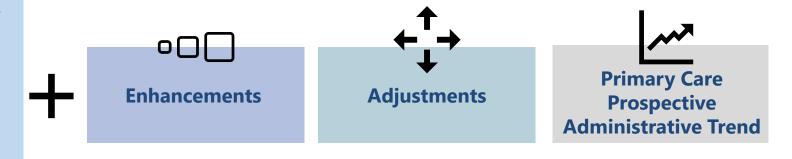
Primary Care Prospective Admin. Trend

An ACO's PPCP will include a base rate derived from the average county primary care spending and amplified by payment enhancements based on characteristics of the ACO and assigned patient population. The PPCP will increase primary care funding for most model participants.



#### **County Base Rate**

- Intended to cover PPCP-eligible primary care services.
- Derived from average county primary care spending.
- CMS will construct a county-level Rate Book of primary care spending for all assignment-eligible Medicare beneficiaries in each county. CMS will use three base years to calculate county base rates.
- Each county will receive two county base rates: an ESRD base rate, and non-ESRD base rate.
- A regionally consistent rate for primary care spending will increase payment for providers that have entrenched patterns of inappropriately low spending for underserved areas and populations.

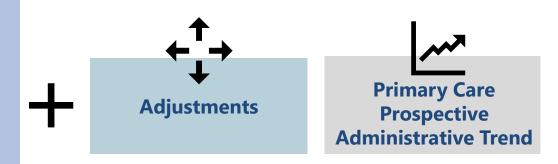


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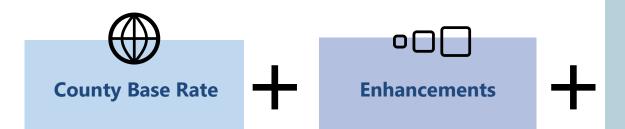


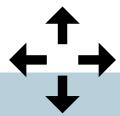


- Intended to fund enhanced primary care services
- Eligibility based on the relevant geographic utilization characteristics
- **County Enhancement**: Applied at the county level to ACOs in counties with low levels of primary care spending relative to the national spending. Increases funding for primary care in underserved areas.
- **Flex Enhancement**: Applied at the ACO-level to all participating ACOs, regardless of location or utilization, to increase investment in primary care.



An ACO's PPCP will include a base rate derived from the average county primary care spending and amplified by payment enhancements based on characteristics of the ACO and assigned patient population. The PPCP will increase primary care funding for most model participants.



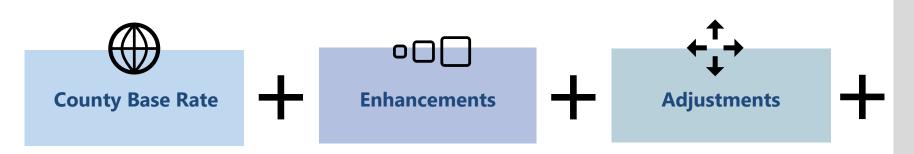


#### **Adjustments**

- A set of adjustments are applied to the PPCP to address various policy objectives
- Adjustments pertain to operational, payment, and healthy equity goals
- Includes a beneficiary-level adjustment for beneficiaries who receive the plurality of primary care services based on allowable charges at FQHCs or RHCs



An ACO's PPCP will include a base rate derived from the average county primary care spending and amplified by payment enhancements based on characteristics of the ACO and assigned patient population. The PPCP will increase primary care funding for most model participants.





# Primary Care Prospective Administrative Trend (PCPAT)

 After the payment has been adjusted, the resulting PPCP will be trended forward to the corresponding performance year based on a PCPAT to produce the final trended adjusted PBPM rate used to set the total PPCP.

## Quality Strategy and Metrics

The ACO PC Flex Model will align with the existing Shared Savings Program quality reporting requirements and performance standards. The ACO PC Flex Model will include an additional measure of person-centeredness using the Person-Centered Primary Care Measure (PCPCM).



### **Person-Centered Primary Care Measure (PCPCM)**

- Administered annually for all PC Flex ACOs
- Assesses whether participants are improving the patient experience and transforming care by focusing their attention, and associated resources, on high value aspects of primary care
- To reduce burden, CMS will fund and manage the administration of the PCPCM Survey. Results will be publicly reported
- Measure results are not included as part of the existing Shared Savings Program quality performance standard used to determine shared savings and shared losses
- To facilitate accurate and complete collection of the PCPCM, ACO participants may be asked to submit supportive information, e.g. patient roster data



#### **Shared Savings Program Quality Reporting Requirements**

Participants are still responsible for all quality measure reporting requirements under the Shared Savings Program

### Health Equity

The ACO PC Flex Model seeks to address underserved communities that are underrepresented in ACO initiatives by increasing the participation of safety net providers in Shared Savings Program ACOs, which should align more underserved beneficiaries to ACOs.







## Increase Participation of FQHCs and RHCs

ACO PC Flex aims to increase participation of FQHCs and RHCs in Shared Savings Program ACOs to align more underserved patients to ACOs and provide enhanced primary care to the populations which need it

## **Equity Promoting Payment Methodology**

A regionally consistent rate for primary care spending corrects patterns of inappropriately low spending. The County Enhancement targets additional funding to counties with historically low levels of primary care spending, evidence of underuse of medical services, and socioeconomic disadvantage. Payment adjustments ensure dollars are allocated according to need.

## Health Equity-Related Questions

Model application will score applicants for health equity experience to ensure that selected ACOs are well positioned to improve quality outcomes for all assigned beneficiaries

## **Application and Next Steps**

### **Application Process and Timeline**

#### Interested in ACO PC Flex? Follow these Next Steps.



#### **Apply to the Medicare Shared Savings Program**

Interested ACOs must apply to the Medicare Shared Savings Program by June 17, 2024 at 12:00 p.m. (noon) ET to be eligible for the model.



#### Sign up for the ACO PC Flex listserv

To stay up-to-date on RFA release and other events and resources, sign up for the ACO PC Flex listserv here.



#### **Prepare for Application**

The ACO PC Flex RFA will be released in Spring 2024. Interested stakeholders can prepare for application by using the resources at the end of this presentation and submitting questions to the Model Mailbox (ACOPCFlex@cms.hhs.gov).

#### **TIMELINE**

May 20, 2024
Shared Savings
Program
Application
Opens

**Q2 2024**ACO PC Flex
Application Opens

June 17, 2024
Shared Savings
Program
Applications
Due

August 2024
ACO PC Flex
Applications Due

January 1, 2025
Performance Period
Begins (Model Start)

January 2025 -December 2029 Performance Period Q&A

### Question and Answer Session



Please submit questions via the Q&A box at the bottom of your screen.

You may also submit questions to the ACO PC Flex Model Team at <a href="mailto:ACOPCFlex@cms.hhs.gov">ACOPCFlex@cms.hhs.gov</a>.

## Frequently Asked Questions



Could a practice join under the umbrella of an IPA or is the creation of an ACO required?

If selected, does every TIN in an ACO have to participate in claims reduction / advanced payment?

Or can some providers choose not to?

## Frequently Asked Questions



Will the one-time payment amount and prospective payments impact Shared Savings Program benchmarks?

How will the Enhanced Amounts be calculated?

## Frequently Asked Questions



Do ACOs need to select prospective assignment for the ACO PC Flex Model? Or can they select retrospective assignment?

## **Closing and Resources**

### Zoom Poll #3



## What topic(s) would you like to learn more about? (Select all that apply)

- a. RFA and Application Process
- b. ACO Eligibility Requirements
- c. Primary Care Investment Targets
- d. Medicaid Participation
- e. Model Overlap
- f. One-Time Advanced Shared Savings Payment
- g. Monthly Prospective Primary Care Payments
- h. Quality and Health Equity Strategies
- i. Other (please explain in the Q&A box)

### Additional Information and Resources

More information about the ACO PC Flex Model application will be shared once it is available.





Stay up-to date:
Join our Listserv here



**Questions?** 

Contact Us at ACOPCFlex@cms.hhs.gov



Review and Share the ACO
PC Flex Model Overview
Factsheet here

Stay tuned for upcoming events to learn more about the ACO PC Flex Model!

## Thank you!

## Thank you!



Thank you in advance for your review and feedback on our model! We appreciate your time and interest!

Please take the survey following this webinar so we can learn how to make our events better.

Do you have questions? Email your comments and feedback to <a href="mailto:ACOPCFlex@cms.hhs.gov">ACOPCFlex@cms.hhs.gov</a> with subject line \*\*ACO PC Flex Model Overview Webinar.

## Appendix

### Sources

#### **Primary Care Landscape (Slide 9):**

- 1. Barnett, M. L., Bitton, A., Souza, J., & Landon, B. E. (2021). <u>Trends in Outpatient Care for Medicare Beneficiaries and Implications for Primary Care, 2000 to 2019</u>. Annals of internal medicine, 174(12), 1658–1665. [published correction appears in Correction: <u>Trends in Outpatient Care for Medicare Beneficiaries and Implications for Primary Care, 2000 to 2019</u>. (2022). Annals of internal medicine, 175(10), 1492.]
- 2. Basu, S., et al (2021). @, 174(7), 920–926.
- 3. Wallace, J., Lollo, A., Duchowny, K. A., Lavallee, M., & Ndumele, C. D. (2022). <u>Disparities in Health Care Spending and Utilization Among Black and White Medicaid Enrollees</u>. JAMA health forum, 3(6), e221398. 3
- 4. Medicaid and CHIP Payment and Access Commission (MACPAC). (2021). Medicaid's Role in Health Care for American Indians and Alaska Natives. Washington, DC. 3
- 5. Larson EH, Andrilla CHA, Garberson LA. (2020). <u>Supply and distribution of the primary care workforce in rural America: a state-level analysis</u>. WWAMI Rural Health Research Center, University of Washington.
- 6. Primary Care Collaborative. (2021). QUICK COVID-19 PRIMARY CARE SURVEY SERIES 30 FIELDED AUGUST 13-17, 2021.
- 7. Chronic Conditions among Medicare Beneficiaries. CMS Research and Statistics: Chartbook (2012 edition).
- 8. Ding, D., Glied, S. (2023, Jan). <u>Are Medicaid Patients Seen in Office-Based Practices Getting High-Quality Primary Care?</u> Commonwealth Fund.
- 9. https://www.cms.gov/blog/cms-innovation-centers-strategy-support-high-quality-primary-care