



MEDICARE-MEDICAID COORDINATION OFFICE

DATE: December 20, 2019

TO: Medicare-Medicaid Plans

FROM: Lindsay P. Barnette
Director, Models, Demonstrations and Analysis Group

SUBJECT: Request for Comments on the Core Quality Withhold Technical Notes for Demonstration Years 2 through 8

Included with this memorandum is the draft Medicare-Medicaid Capitated Financial Alignment Model Core Quality Withhold Technical Notes document for Demonstration Years (DY) 2 through 8. Please see below for a summary of our proposed substantive changes as compared to the Core Quality Withhold Technical Notes for DY 2 through 5 (Issued April 29, 2016; Updated March 14, 2018). The changes include adding two new sections that provide additional guidance, updating one measure to reflect a temporary suspension, and adjusting the benchmark for two measures. For the two measures with benchmark adjustments, we made the changes in order to encourage Medicare-Medicaid Plans (MMPs) to continue their quality improvement efforts and achieve better outcomes for beneficiaries.

At this time, we are seeking comments on the proposed changes only. Please submit any comments, using the included template, to the Medicare-Medicaid Coordination Office at mmcocapsmodel@cms.hhs.gov by January 10, 2020. We will revise the draft document as appropriate based on comments received.

SUMMARY OF PROPOSED CHANGES

Rounding Rules for Measure Scores – We added this new section to provide information about rounding rules for purposes of the quality withhold analysis.

Adjustment for Extreme and Uncontrollable Circumstances – We added this new section, which articulates the quality withhold adjustment policy for MMPs that are affected by extreme and uncontrollable circumstances, such as major natural disasters. We previously communicated this policy in an HPMS memorandum issued April 1, 2019.

Plan All-Cause Readmissions Measure – Based on an analysis of national (e.g., Medicare Quality Compass percentiles) and MMP performance trends for this measure that demonstrate a decrease in scores over time, we are proposing to revise the benchmark to 0.85 as of the 2020

measurement year. We are aware of the measure steward's changes to this measure and the temporary removal from Medicare Part C Star Ratings as of the 2019 measurement year; however, the quality withhold analysis for MMPs utilizes a different methodology for calculating the measure, such that we do not expect the changes to substantively impact MMP scores. We will continue to monitor national and MMP performance data and specification updates to determine if further benchmark adjustments are warranted, particularly if the measure steward rebaselines the risk adjustment model in the future.

Controlling Blood Pressure Measure – Due to the measure steward's significant changes to the specifications as of the 2018 measurement year, we are proposing to suspend this measure from the quality withhold analysis for two years. It will be reinstated as of the 2020 measurement year with a proposed benchmark of 71%.

Medication Adherence for Diabetes Medications Measure – Based on an analysis of national (e.g., Medicare Part C and D Star Ratings cut points) and MMP performance trends for this measure that demonstrate an increase in scores over time, we are proposing to revise the benchmark to 80% as of the 2020 measurement year.