

### Integrated Care for Kids (InCK) *Alternative Payment Model Application Requirements*

Center for Medicare and Medicaid Innovation (CMMI) Centers for Medicare & Medicaid Services (CMS)



### Alternative Payment Models... what are they?



#### What is an Alternative Payment Model?

#### An Alternative Payment Model (APM) is a

payment approach that ties payments to the delivery of high-quality and cost-efficient care.

APMs can apply to a specific clinical condition, a care episode, or a population.



Why are we asking the **State** to **design APM(s)** for InCK?

Financial incentives should **align** with care delivery reforms

Providers need **funding models** that enable **sustained change** 

States have the **authority** over Medicaid FFS and Managed Care payment policy

Every state Medicaid program is different



#### Potential APM Approaches

**Shared Savings**: Offer providers that deliver high quality care and reduce spending compared to a financial target the ability to share in a portion of the savings they generate

#### Shared Savings and Downside Risk: Offer

providers a chance to receive a larger portion of savings while also holding them accountable for repaying a portion of spending if they exceed a financial target



#### Potential APM Approaches

#### **Episode Based and Bundled Payments**: Offer

providers or health care facilities a single payment for services used to treat a specific medical event or condition, and incorporate measures to monitor the quality of care received

**Population Based Payments**: Offer providers a predetermined payment amount for delivering high-quality care to a defined group of patients



**APM** design considerations:

#### BASELINE

**Selecting a Reference**: are providers setting a personal best or trying to beat the field

**Statistical Significance**: reduce random variation with large patient populations

**Calculating Expected Costs**: predicting the future of utilization and spending changes



# APM design considerations: SETTING EXPECTATIONS

**Patient Attribution**: who is counted as a patient impacts calculations of cost and performance

**Discounting APM Investments**: some APMs include upfront investments to providers for infrastructure or staff that are then repaid using future savings

**Percent Change or Total Dollars**: is the goal for spending to remain below a spending level (total dollars) or spending trend (rate of growth)



#### APM design considerations: AVOIDING UNINTENDED CONSEQUENCES

**Preventing Cherry Picking and Skimping**: APMs should include protections against providers avoiding complex patients or stinting care

**Making Quality Count**: APMs must include quality measures to ensure savings are not generated by delivering poor care



#### APM design considerations: EXPECTING THE UNEXPECTED

**Dealing with Outliers:** rare conditions or events can result in patients with catastrophic claims. APMs need to include protections for providers with unusually high-cost patients



# What are the APM requirements for InCK?

# What needs to be included in the InCK Application?



#### InCK Model APM Requirements

- State Medicaid Programs must implement APMs that support payment and accountability for achieving model goals in InCK regions using the appropriate Medicaid and/or CHIP authorities
- APM(s) must include coverage for integrated care coordination, mobile crisis response, and case management services
- The APM may be built off of Fee-For-Service or Population-Based Payment approaches



#### InCK Model APM Requirements

- States may implement APMs to compensate providers serving children under the InCK model as early as model year 3 and must implement APMs by model year 4
- **Downside financial risk-sharing** arrangements cannot be used until model year 5 and are **not required** at any point to participate in the model



#### InCK Model **APM Guidelines**

- Proposed APM(s) must have a clear method of patient attribution and a process for communicating the attribution methodology to providers
- Payment models should be designed with the following considerations in mind:
  - Financial or Value-based payment incentives for providers should be significant enough to **support investment** in changes to care delivery while accounting for provider ability to **manage financial and clinical risk**;
  - They should maximize long-term opportunities for returns on investment and reward short-term outcomes that contribute to managing long-term risk; and
  - APMs should promote **person-centered care**
- Alternative payment models for the purposes of the InCK Model are not Alternative Payment Models as defined at 42 CFR §1305 for the purpose of the Quality Payment Program.



#### InCK Model **APM NOFO Application**

The application requirements are intended to provide CMS an **outline** for what a **state intends to do if selected** for participation in InCK

We recognize that **some details** of the payment model approach outlined in the application **may change** as states design the APM during the two-year pre-implementation period

Applications should **identify** the **Medicaid and CHIP authorities** states plan to use to implement the APM(s)



#### InCK Model **APM NOFO Application**

- The NOFO application should include information on the following:
  - **Provider types** to be paid under the APM
  - Service types and units to be paid under the APM
  - The basis and/or **rate determination methods** the state anticipates using to develop the APM
  - Method of payment: directly from the state or under a managed care arrangement



#### InCK Model **APM NOFO Application**

- The NOFO application should include information on the following:
  - How the state plans to **fund the non-federal portion** of payments
  - Type(s) of performance-based payments to be made under the APM and how they will be developed
  - If state plans to implement **population-based payments** (how they will be developed and what sources of data will be used)
  - How quality of care will be measured



#### APM **CONSIDERATIONS** for Medicaid

**Managed Care**: States using managed care must work with their managed care plans to implement APMs. States can do this but require time to negotiate and implement contract changes

**Legislative Processes**: Some states may require legislative approval for certain changes to Medicaid payment policy

**Recouping Savings**: States can only claim federal match on funds that have been paid out. States should consider how opportunities to reduce utilization and improve outcomes impact spend over time



## Key Takeaways?





**Who:** States must commit to designing an APM(s) as part of participation in the InCK model

**What**: APM(s) must cover InCK care delivery, case management, and crisis response services and meet requirements and guidelines spelled out in the NOFO



#### In **SUMMARY**

**Where**: APM(s) must apply to care/services for beneficiaries in InCK regions

**When**: APM(s) must be in effect by the start of model year 4

**Why**: Care delivery reforms need to be paired with payment models to be sustainable



#### If Awarded

State selected for InCK will be required to contact CMCS **immediately** upon award to **begin the process identifying** and **implementing authorities** necessary for their InCK Model

CMMI **Project Officers** will assist awardees in **identifying solutions** to implementation challenges and **provide guidance** on model goals

CMMI will have a **technical assistance** contractor available to support awardees during the duration of the model



#### Additional **RESOURCES**

A number of organizations have published **primers** on **APM design** and **reviews** of **state level payment reforms** that may be helpful.

These include (but are not limited to):

 The Health Care Payment Learning & Action Network: <u>https://innovation.cms.gov/initiatives/Health-Care-Payment-Learning-and-Action-Network/</u> or <u>www.hcp-lan.org</u>



#### THANK YOU for attending this webinar

- Email: <u>healthychildrenandyouth@cms.hhs.gov</u>
- Visit: <a href="https://innovation.cms.gov/initiatives/integrated-care-for-kids-model/">https://innovation.cms.gov/initiatives/integrated-care-for-kids-</a> model/
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