

# Utilization and Choosing Wisely

Tom Evans, MD
TCPi 2018 Learning Community

#### **Delivery System Reform Requires Focus**

Provider Payment

Care Delivery

Information Distribution



#### TCPi: 5 Phases of Transformation



**Set Aims** 



Use Data to Drive Care



Achieve Progress on Aims



Achieve Benchmark Status



Thrive as a
Business via
Pay for
Value
Approaches

Iowa Healthcare Collaborative

#### TCPi Goals

- Support more than 140,000 clinicians in their practice transformation work
  - Improve health outcomes for millions of Medicare, Medicaid and CHIP beneficiaries and other patients
    - Reduce unnecessary hospitalizations for 5 million patients
    - Generate \$1 to \$4 billion in savings to the federal government and commercial payers
- Sustain efficient care delivery by reducing unnecessary testing and procedures
  - Transition 75% of practices completing the program to participate in Alternative Payment Models
- Build the evidence base on practice transformation so that effective solutions can be scaled



#### How It Began.....

- In 2010, Howard Brody, MD, published Medicine's Ethical Responsibility for Health Care Reform – The Top Five List in NEJM
  - Challenged specialty societies to identify five tests/treatments that were overused and provided no meaningful benefit to patients
  - Internal Medicine was the first to respond, followed shortly by FM and Pediatrics
- There are now more than 80 societies that comprise just over one million clinicians that are now part of Choosing Wisely
- Furthermore, 19 other countries have started their own Choosing Wisely campaign



#### Scope of the Problem

- In 2017, a survey sponsored by the ABIM Foundation found:
  - 75% of U.S. Physicians reported the frequency with which physicians order unnecessary tests is a "serious problem" for America's healthcare system
  - 69% reported physicians ordered these tests at least once weekly
- Over \$750B annually spent in unnecessary care in U.S.
  - \$395B estimated due to physician-driven waste
  - Unnecessary labs, imaging studies, and chasing incidental findings of uncertain clinical significance

### Iowa Healthcare Collaborative

- ABIM survey found that physicians exposed to Choosing Wisely campaign were:
  - less likely to order unnecessary tests nearly 1/3 reduction, or 59% to 43%
- Another study found that while overall awareness was only 40%, those who were aware were, "significantly more likely to report reducing the number of unnecessary tests or procedures in the last 12 months"



#### Benefits of Choosing Wisely

- Evidence-based recommendations
- Avoids potentially unnecessary testing
  - Decreases likelihood of identifying findings of doubtful or no clinical significance
  - Avoids risk of complications of invasive procedures, medications
  - Avoids unnecessary (and sometimes prolonged) surveillance
- Reduces costs: physical, emotional and financial
- This is, quite simply, better medicine



## Some Examples of CW Recommendations

Society of General Internal Medicine (5)

American Academy of Family Physicians (15)

American Academy of Pediatrics (10)



# Society of General Internal Medicine

- DO NOT recommend daily home glucose testing in Type II diabetics on oral medications
- DO NOT perform routine general physicals and lab testing in asymptomatic adults with no chronic medical conditions or health concerns
- DO NOT perform routine preoperative testing before low risk procedures
- DO NOT recommend cancer screening in patients with life expectancy less than 10 years



# American Academy of Family Physicians

- DO NOT prescribe antibiotics for mild to moderate sinus infections unless symptoms last for at least 7 days, or worsen after initial improvement
- DO NOT prescribe antibiotics for otitis media in children between ages 2-12 where observation is an option
- DO NOT require a pelvic exam or other exam in order to prescribe oral contraceptives
- DO NOT routinely screen for prostate cancer using PSA or DRE
- DO NOT screen adolescents for scoliosis



# American Academy of Pediatrics

- Neuroimaging is unnecessary in a child with a simple febrile seizure
- CT scans are **not** necessary in the immediate evaluation of minor head injuries (use PECARN criteria)
- Cough and cold medicines should not be prescribed or recommended for children under four years of age.
- Antibiotics should **not** be used for apparent viral respiratory illnesses (sinusitis, pharyngitis, bronchitis, bronchiolitis)



#### The "lowa Five"

- DO NOT image the spine in patients with nonspecific low back pain, and do not image the spine for low back pain within first 6 weeks unless "red flags" present
- DO NOT image the brain for uncomplicated headaches
- DO NOT image the brain in the evaluation of syncope if the neurologic exam is normal
- Avoid unnecessary use of head CT/MRI in the evaluation of minor head injuries
- DO NOT order sinus CT or indiscriminately order antibiotics for uncomplicated for uncomplicated rhinosinusitis



# Compass PTN Utilization Measures

- DO NOT image the spine in patients with nonspecific low back pain, and do not image the spine for low back pain within first 6 weeks unless "red flags" present
- DO NOT prescribe antibiotics for mild to moderate sinus infections unless symptoms last for at least 7 days, or worsen after initial improvement

#### AND

Employ techniques to avoid ED Utilization
 (Cases avoided through the "Call me First" Campaign







### Transforming Clinical Practice

The State of the Union

Tom Evans, MD

Compass PTN Learning Community

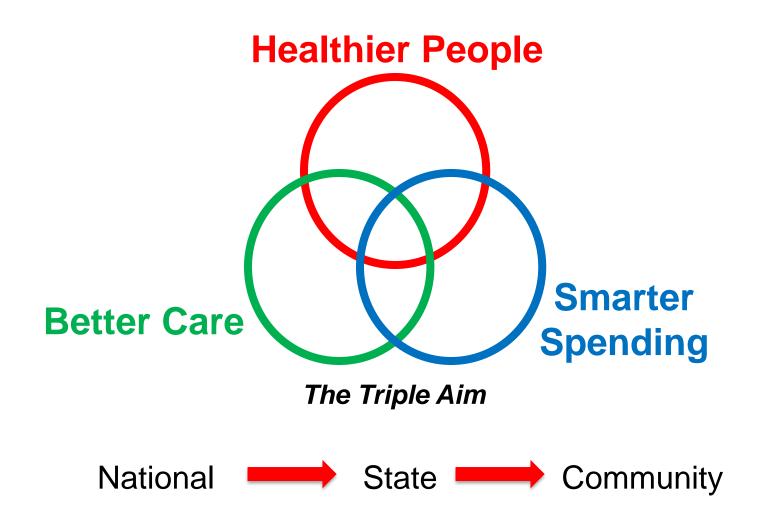
Summer 2018



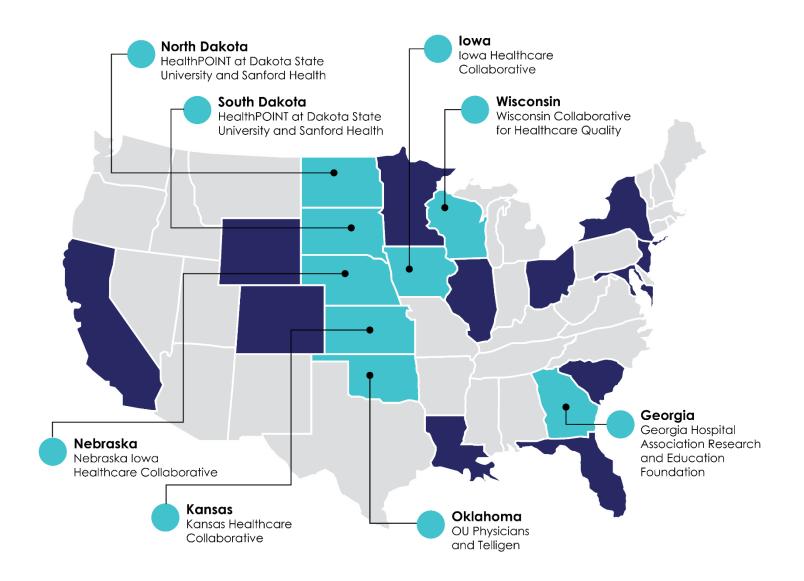
#### **Objectives**

- Discuss TCPi and next steps for clinicians and practices
- Recognize how these collaborative programs will affect quality improvement and facilitate wholesystem transformation
- Explain the power of aims-based collaborative learning to achieve new levels of performance

### Delivery System Reform







#### **Delivery System Reform Requires Focus**

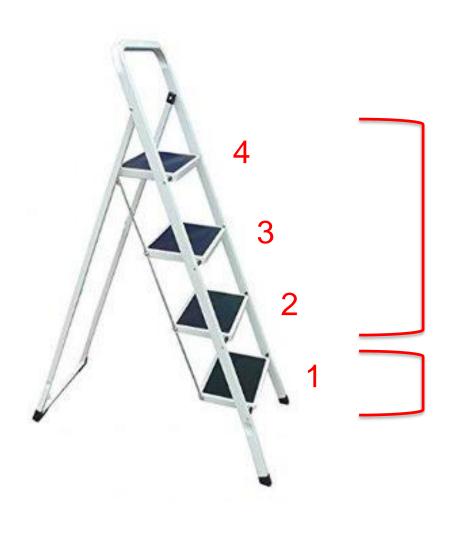
Pay Providers

Deliver Care

Distribute Information



# MACRA: QPP Quality Payment Program



Alternative Payment Models (APM)

Merit-based Incentive Payment System (MIPS)

#### TCPI: 5 Phases of Transformation



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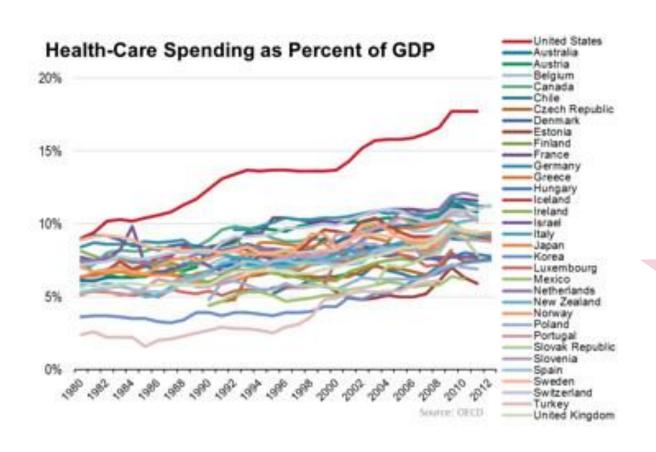
#### TCPi Goals

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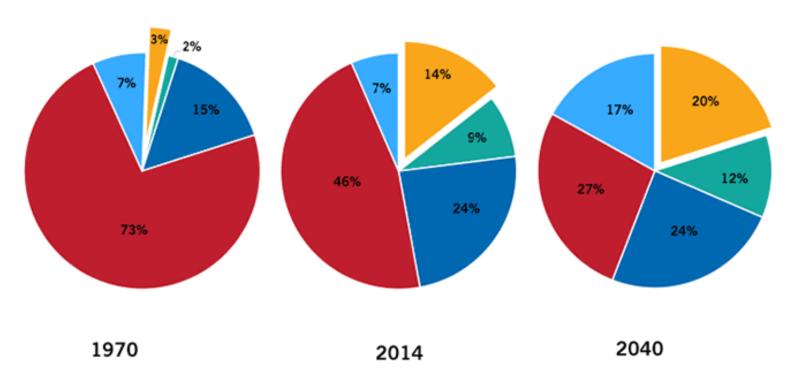
#### Health Care and GDP





#### Medicare spending is a growing share of the federal budget

■ Medicare ■ Medicaid ■ Social Security ■ Other Programs ■ Net Interest



SOURCE: Office of Management and Budget, Budget of the United States Government, Fiscal Year 2015, February 2015 and Congressional Budget Office, The 2015 Long-Term Budget Outlook, June 2015. Compiled by PGPF.

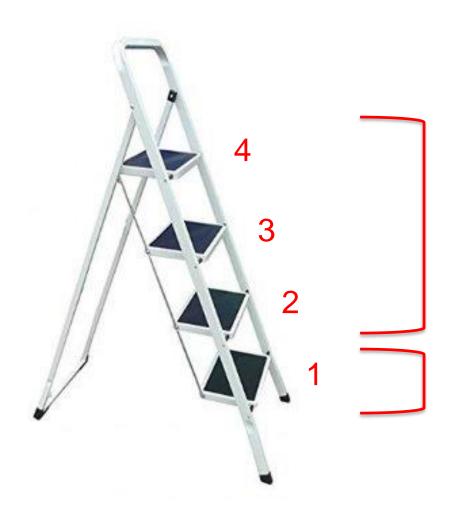
© 2015 Peter G. Peterson Foundation PGPF.ORG

### What an Opportunity!

#### Medicare Shared Savings Program (MSSP)

Department of Health and Human Services (HHS) Secretary Azar said in March that program "results have been lackluster," and Centers for Medicare & Medicaid Services (CMS) Administrator Seema Verma singled out one-sided risk ACOs for "increasing Medicare spending... encouraging consolidation in the market place, reducing competition and choice for our competition." Verma concluded that "our system cannot afford to continue with models that are not producing results."

# MACRA: QPP Quality Payment Program



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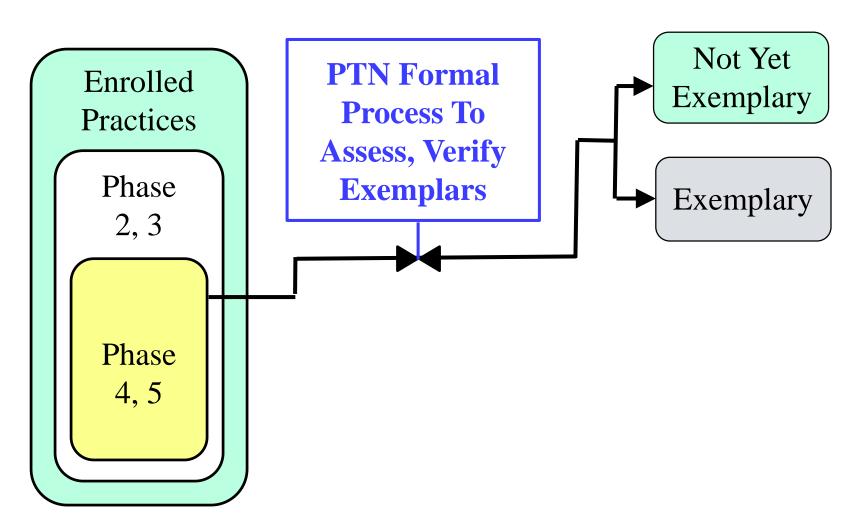
### PTNs Determine Exemplars

PTN Enrolled **Practices** Phase 2, 3 Phase 4, 5

Not Yet Exemplary

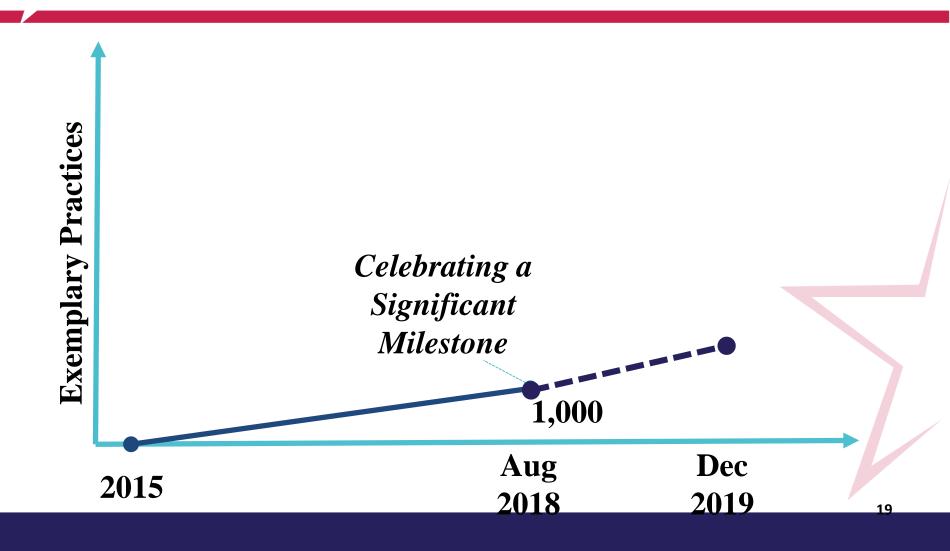
Exemplary

### PTNs Determine Exemplars



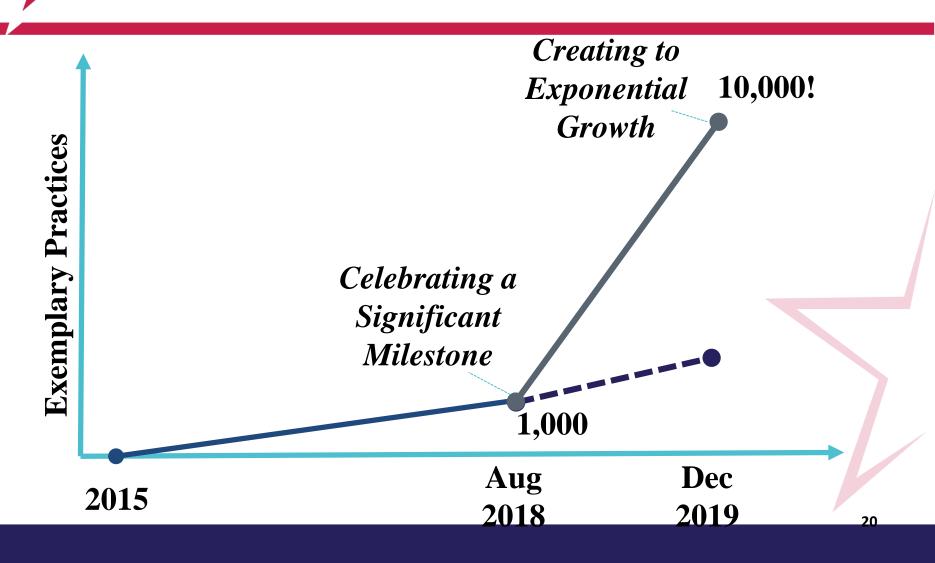


#### Identified Exemplary Practices

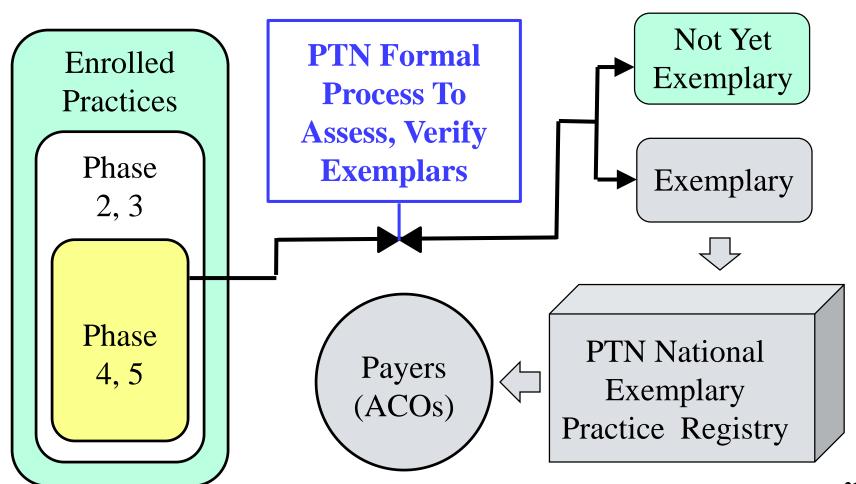




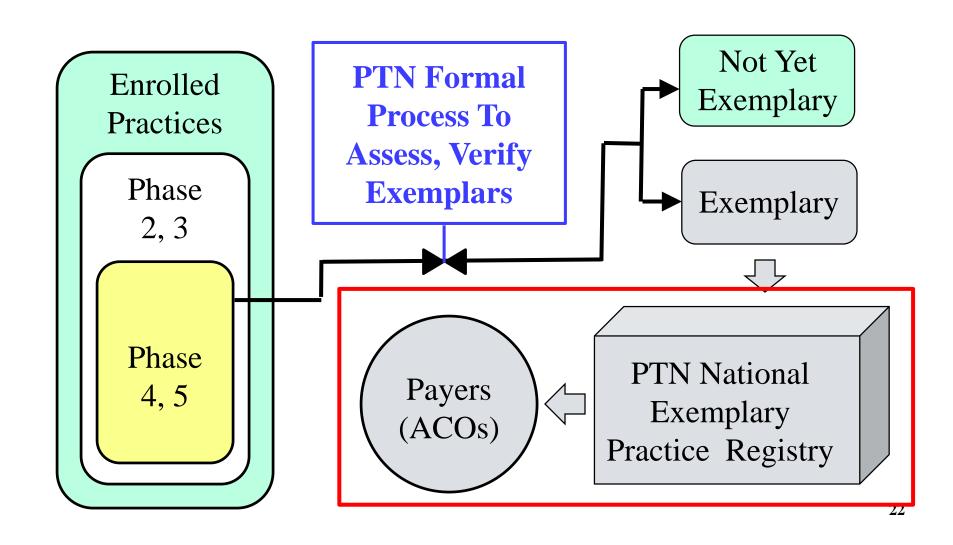
# Achieving 10,000 Exemplary Practices



## PTNs Determine Exemplars



## PTNs Market Exemplars



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## Compass PTN Definition of Exemplar Practices

- Phase Progression: Phase IV or V
- Provide a "Story Worth Emulating"
  - Practice can demonstrate (articulate and display) on at least 2 of the 4 TCPi Service Delivery Aims
    - (Outcomes, Utilization, Hospitalization, Tests and Procedures)
- Patient and Family Engagement (PFE)
  - Reporting on at least 3 of the 6 PFE measures



## A Story Worth Emulating

- Patient-centered Goal
  - What was the envisioned purpose of change
- Intervention
  - What did you do to change care
- Data
  - What measures? How did you use to inform process?
- Results
  - What happened?
- Patient-centered Impact
  - How was care improved from the patient's perspective?

## On the Horizon...





# "On the Horizon" Take Home Points

- It's really going to happen. It can't not happen.
- From "more is better" to "better is more"
- You can run, but you can't hide. Data is the currency of improvement.
- Run hard on this last lap...maximize the resources available (i2i, ICE, QIAs, etc.)
- Become an Exemplar



### THE CODING EDUCATOR

STEVEN ALLEN ADAMS, MCS, CPC, COC, CPC-I, CPMA, FCS, PCS, COA



# Documentation Pearls for Surviving Payment for Performance surviving value based medicine

Steve Adams, MCS, COC, CPC, CRC, CPMA, CPC-I, PCS, FCS, COA

email: steve.adams@inhealthps.com web: thecodingeducator.com

## **Payment for Performance**

The goal of P4P is to improve quality and outcomes for patients. Reaching this goal is based on a set of changes in the way a patient receives care and the way providers quantify that care back to the plan via reporting, validating and coding of services.



### **Discussion Points**

- 1. Quality Payment Program (QPP)
- 2. Accountable Care Organizations (ACO)
- 3. Clinically Integrated Network (CIN)
- 4. Bundled Payment Models (BPM)
- 5. Risk Adjustment Models (HCC and RAF)



# QPP



## Quality Payment Program (QPP)

CMS rewards high value, high quality Medicare clinicians with payment increases - while at the same time reducing payments to those clinicians who aren't meeting performance standards.

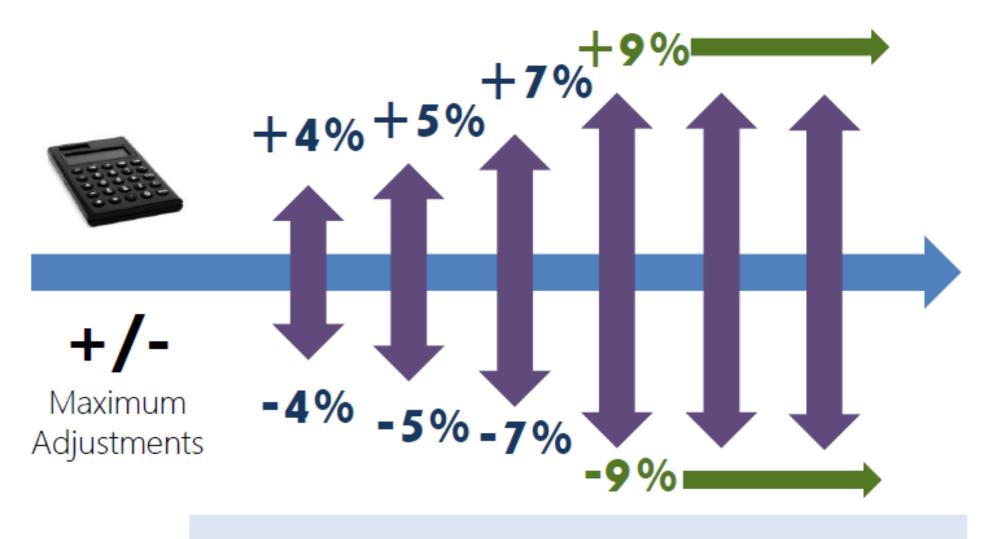


## Merit-Based Incentive Payment System (MIPS)

MIPS **combines** parts of the Physician Quality Reporting System (**PQRS**), the Value Modifier (**VM** or Value-based Payment Modifier), and the Medicare Electronic Health Record (EHR) incentive program into one single program:

- 1. Quality
- 2. Cost
- 3. Promoting Interoperability
- 4. Advancing Care Information





2019 2020 2021 2022 onward

Clinicians have two tracks to choose from in the Quality Payment Program based on their practice size, specialty, location, or patient population:

- 1. Merit-based Incentive Payment System (MIPS) or
- 2. Advanced Alternative Payment Models





#### 2018 MIPS Quality

Patien	t Name: DOS:					
Do th	Do this on every Red White and Blue Medicare Patient					
	#1 DESCRIPTION: Hemoglobin A1c Management (only if the patient has type 1 or 2 DM)					
Numer	rator Options (Pick One):					
OR	[ ] Most recent hemoglobin A1c (HbA1c) level less than 7.0% (3044F)					
OR	[ ] Most recent hemoglobin A1c (HbA1c) level between 7.0 to 9.0% (3045F)					
	[ ] Most recent hemoglobin A1c level over 9.0% (3046F)					
	# 110 DESCRIPTION: Current Season's Influenza Immunization					
Numer	rator Options (Pick One) During October 1, 2018 and December 31, 2018					
OR	[ ] Yes, the patient got a flu shot this year (G8482)					
OR	[ ] Nope, there is a medical reason for not giving flu shot or the patient refused (G8483)					
	[ ] Nope, this person has not had a flu shot this year (G8484)					





Episo	de-Based Cost Measures				leasure	Percent Difference Between Your TIN-NPI's Average Risk- Adjusted Episode Cost and National	
•		Episode Count for Your TIN-NPI	Average Episode Risk Score Percentile	Sc	ore		
Туре	Name			Your TIN- NPI	National Average		
Procedural	Elective Outpatient PCI	-	-	-	\$10,902	-	
Procedural	Knee Arthroplasty	-	-	-	\$19,172		
Procedural	Revascularization For Lower Extremity Chronic Critical Limb Ischemia	-	1	•	\$23,219	-	
Procedural	Routine Cataract Removal with IOL Implantation	-	1	•	\$2,676	-	
Procedural	ural Screening/Surveillance Colonoscopy		84th	\$902	\$873	3%	
Acute IP Medical Condition			-	-	\$22,959	-	
Acute IP Medical Condition	Simple Pneumonia with Hospitalization	-	-	-	\$10,142	-	
Acute IP Medical Condition	STEMI with PCI	-	<u>-</u>	-	\$19,159	-	

## Quality – New for 2018

## Appendix B: Episode-Level Table for All Episodes Attributed to Yo

Please see Appendix C for more information on the metrics presented in the table below.

	E	pisode Information	Episode Costs				
Episode Group	Episode ID	Episode Sub-Group (if applicable)	Observed (Non- Risk-Adjusted) Cost	Risk-Adjusted Cost	Risk-Adjusted Cost Percentile	Risk Score	
_	7	_	~	~	▼	-	
Screening/Surveillance Colonoscopy	24545.0992	-	\$1,352	\$1,334	93rd	1.01	
Screening/Surveillance Colonoscopy	24604.0922	-	\$1,467	\$1,401	94th	1.05	
Screening/Surveillance Colonoscopy	24774.0702	-	\$851	\$809	43rd	1.05	
Screening/Surveillance Colonoscopy	24819.0662	-	\$1,389	\$1,382	94th	1.00	
Screening/Surveillance Colonoscopy	24882.1002	-	\$1,131	\$1,126	82nd	1.00	
Screening/Surveillance Colonoscopy	25157.0202	-	\$937	\$951	60th	0.98	
Screening/Surveillance Colonoscopy	25204.0802	-	\$326	\$314	3rd	1.04	
Screening/Surveillance Colonoscopy	25369.0452	-	\$197	\$190	0th	1.03	
Screening/Surveillance Colonoscopy	25625.0132	-	\$1,150	\$779	39th	1.48	
Screening/Surveillance Colonoscopy	25636.0092	-	\$521	\$499	8th	1.04	



## <u>Alternative Payment Models (APM)</u>

APMs give us new ways to pay health care providers for the care they give Medicare beneficiaries. For example:

- 1. From 2019-2024, pay some participating health care providers a lump-sum incentive payment.
- 2. Increased **transparency** of physician-focused payment models.
- 3. Starting in 2026, offers some participating health care providers **higher annual payments**.



# Accountable Care Organizations



An ACO is a group of providers—
potentially including physicians,
hospitals, post-acute providers, and
others—who are collectively
responsible for the care outcomes
of a patient population.



#### Shared Savings Program ACO Participation Options

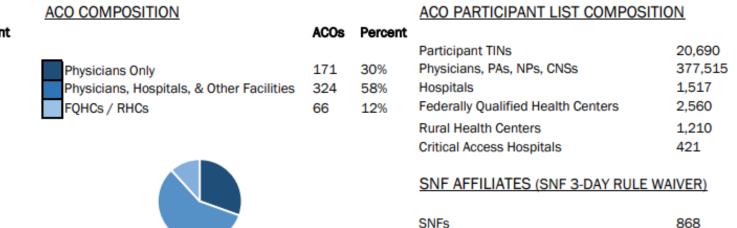
The Shared Savings Program offers different participation options (tracks) that allow ACOs to assume various levels of risk.

Track	Financial Risk Arrangement	Description
1	One-sided	Track 1 ACOs do not assume downside risk (shared losses) if they do not lower growth in Medicare expenditures.
Medicare ACO Track 1+ Model*	Two-sided	Medicare ACO Track 1+ Model (Track 1+ Model) ACOs assume limited downside risk (less than Track 2 or Track 3).
2	Two-sided	Track 2 ACOs may share in savings or repay Medicare losses depending on performance. Track 2 ACOs may share in a greater portion of savings than Track 1 ACOs.
3	Two-sided	Track 3 ACOs may share in savings or repay Medicare losses depending on performance. Track 3 ACOs take on the greatest amount of risk, but may share in the greatest portion of savings if successful.

#### 2018 ACCOUNTABLE CARE ORGANIZATION INFORMATION

ACO CHARACTERISTICS		
	ACOs	Percent
Non-Risk Based:		
Track 1	460	82%
Risk Based:		
Track 1+ Model	55	10%
SNF 3-Day Rule Waiver	31	-
Track 2	8	1%
Track 3	38	7%
SNF 3-Day Rule Waiver	30	-

ACO CHARACTERISTICS



# Still Have Four Measures

Quality – more measures – but it's all providers doing this

**Cost** – only certain specialties

Promoting Interoperability – **on your own** 

Advancing Care Information – **done by ACO** 

#### **Compass PTN Core Measures**

Measure ID	Measure Name	Denominator	Numerator	NQS Domain	Measure Type/ QPP Priority Level	QPP Specialty Measure Set
NEW MEASURE eMeasure ID: N/A eMeasure NQF: N/A NQF: N/A QualityID: 402 *This measure is a TCPI Common Measure	Tobacco Use and Help with Quitting Among Adolescents	the measurement period	Patients who were screened for tobacco use at least once within 18 months (during the measurement period or the six months prior to the measurement period) AND who received tobacco cessation counseling intervention if identified as a tobacco user	Population Health	Process	Allergy/Immunology Internal Medicine Cardiology Dermatology Emergency Medicine Gastroenterology General Surgery General Oncology Hospitalists Neurology Obstetrics/Gynecology Ophthalmology Orthopedic Surgery Otolaryngology Physical Medicine Preventive Medicine Rheumatology Thoracic Surgery Urology Vascular Surgery Mental/Behavioral Health Plastic Surgery General Practice Family Medicine Pediatrics
NEW MEASURE eMeasure ID: CMS2v6 eMeasure NQF: N/A NQF: 0418 QualityID: 134  *This measure is a TCPI Common Measure	Preventive Care and Screening: Screening for Clinical Depression and Follow-up Plan	All patients aged 12 years and older	Patients screened for depression on the date of the encounter using an age appropriate standardized tool AND, if positive, a follow-up plan is documented on the date of the positive screen	Community/ Population Health	Process	Internal Medicine Mental/Behavioral Health General Practice Family Medicine Pediatrics

#### **Tobacco Cessation Codes**

#### The CPT Codes:

**99406**: Smoking and tobacco cessation counseling; intermediate, greater than 3 minutes, up to 10 minutes,

**99407**: Smoking and tobacco cessation counseling; intensive, greater than 10 minutes,

#### The Diagnosis Codes

- ICD-10 code F17.210 (dependent tobacco use disorder), or
- ICD-10 code Z87.891 (history of tobacco use).

If used with E/M, don't forget modifier 25



## **Annual Depression Screen**

The HCPCS Code

**G0444** - Annual Depression Screening – 15 minutes

ICD-10: **Z13.89** 

**Frequency**: Annually

MCR Reimbursement: \$17.13



#### DM-7 Diabetes: Eye Exam

#### DESCRIPTION:

Percentage of patients 18 – 75 years of age with diabetes who had retinal or dilated eye exam by an eye care professional during the measurement period OR a negative retinal exam (no evidence of retinopathy) in the 12 months prior to the measurement period.

#### 10. Determine if patient was screened for diabetic retinal disease identified by one of the following:

- A retinal or dilated eye exam by an eye care professional during the measurement period (2017)
- A negative retinal exam (no evidence of retinopathy) by an eye care professional in the year prior to the measurement period (2016)

The eye exam must be performed or reviewed by an ophthalmologist or optometrist

Alternatively, results may be read by a qualified reading center that operates under the direction of a medical director who is a retinal specialist

For example, if an endocrinologist or PCP performs the appropriate imaging in their office and the results are reviewed by an eye care professional (optometrist or ophthalmologist) during the measurement period or the year prior to the measurement period (if negative for retinopathy) then it is eligible for use in reporting

#### Note:

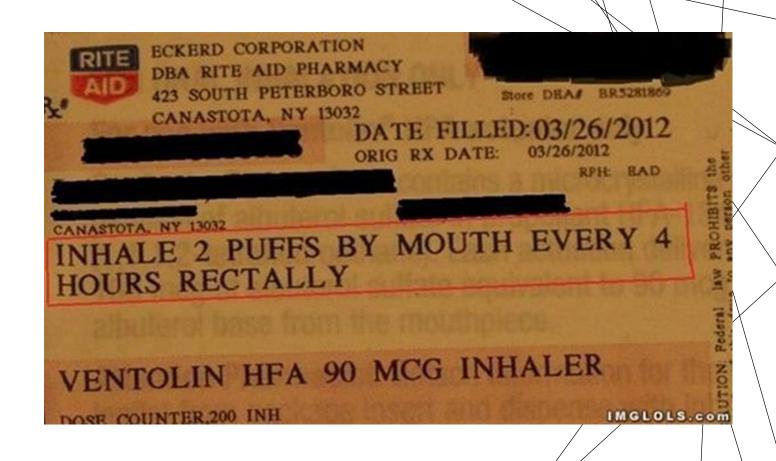
- Who-The eye exam must be performed by an ophthalmologist or optometrist.
- What- The date of the retinal or dilated eye exam and results of the negative retinal exam if the exam was performed in the year prior to the measurement period. Patient reported data is acceptable as long as date (year) and result/finding are known and documented.
- YES (2)
- NO (1)



At the end of the year, the ACO will have you "fill in gaps" that CMS state might be missing from specific patients assigned to your ACO -Good news is, several providers are also providing data that you might have overlooked



## Clinically Integrated Networks





## Clinically Integrated Network (CIN):

A CI program involves a network of otherwise independent physicians who collectively commit to quality and cost improvement. To support these efforts, physicians in the CI network may—under a "safe harbor" from antitrust law negotiate collectively for commercial payer contracts, with joint contracting seen as "reasonably necessary" to support investment (of both time and resources) in performance improvement and ensure cross-referrals among participating providers.



A clinically integrated network (CIN) and an accountable care organization (ACO) have similar goals, though they are structured in different ways.

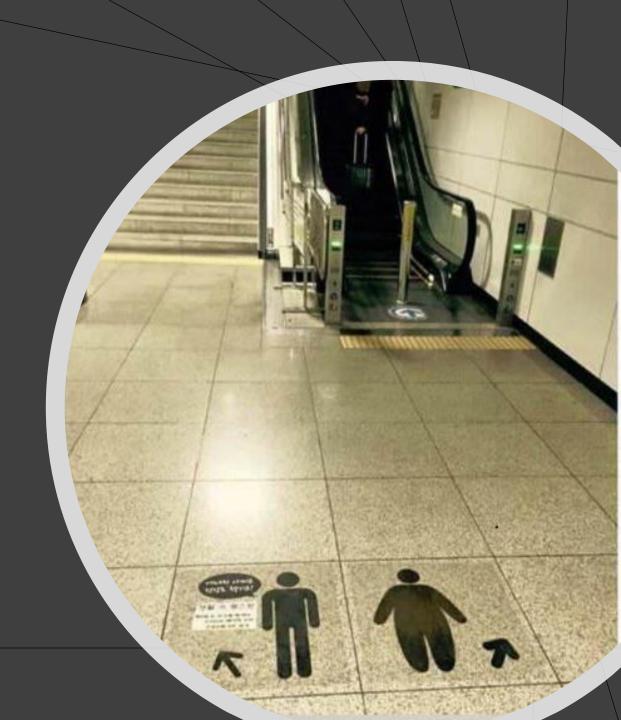
This doesn't mean they are mutually exclusive, however. In fact, a CIN often serves as the physician network arm of a larger ACO



## Like an ACO

#### You might have:

- Chronic Care Coordinators
- Prescription Drug Advocates
- Case managers for coding
- Transitional Care Coordinators
- Annual Well & Preventive Healthcare Staff





# Bundled Payment Models



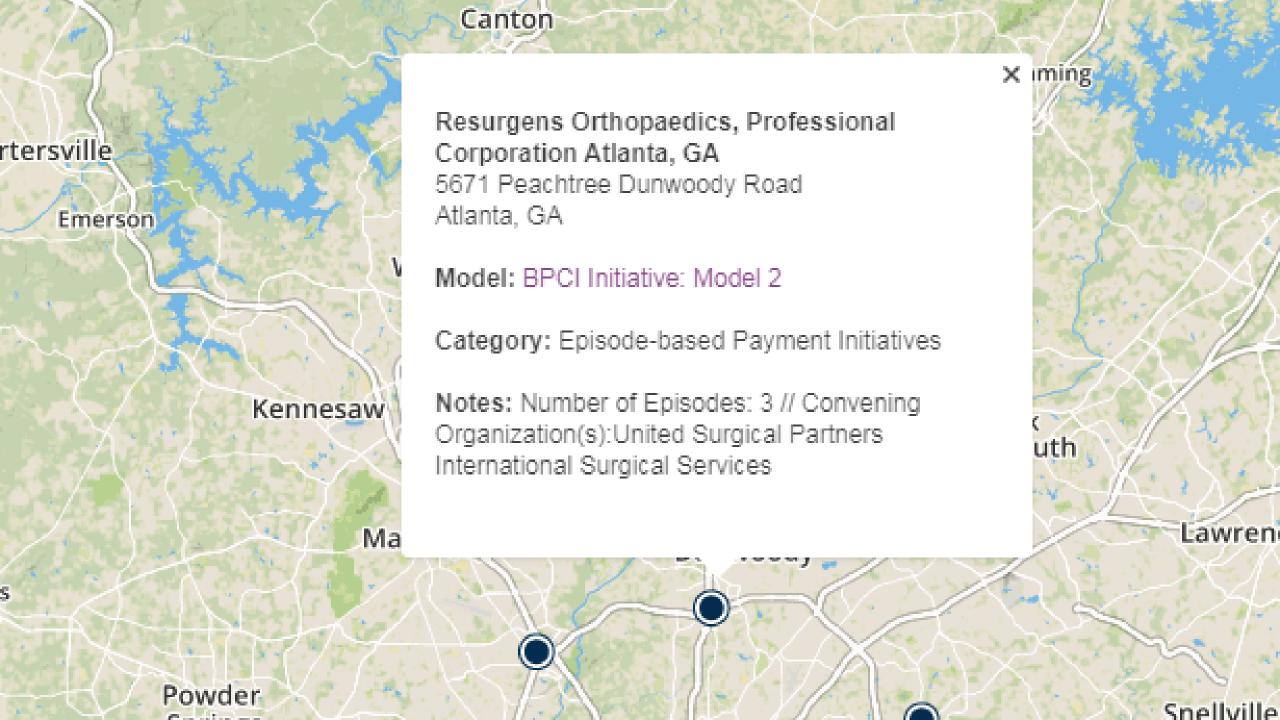
# **Bundled Payment Models**

Payers typically set the bundled payment amount at the historical price for providing care to a patient undergoing a certain procedure or managing a specific condition. The historical price is typically adjusted for regional price variations and patient characteristics as well as discounted to promote cost reductions. – **Good for Surgeons** 

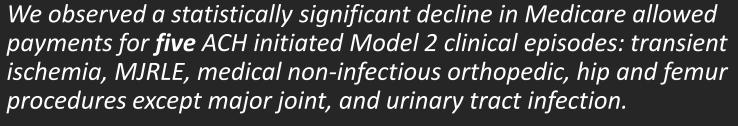


Exhibit 10: Characteristics of the Matched BPCI Providers Included in the DiD Estimates, Model 2, Q4 2013 - Q3 2016

Clinical Episode	Matched Els (#)	Matched Intervention Period Episodes (#)	Average Length of Participation (Quarters)	Els that Terminated Participation in the Clinical Episode (%)	Episodes from Els that Terminated (%)
Acute myocardial infarction	93	5,337	5	41%	36%
Cardiac arrhythmia	70	6,029	5	51%	45%
Cardiac valve	31	3,957	6	48%	53%
Cellulitis	79	5,474	5	43%	50%
Cervical spinal fusion	34	1,190	5	44%	34%
Congestive heart failure	173	31,858	5	30%	29%
COPD, bronchitis, asthma	133	18,331	6	31%	33%
Coronary artery bypass graft	43	3,242	6	28%	32%
Diabetes	45	1,423	5	38%	24%
Esophagitis, gastroenteritis & other digestive disorders	58	4,104	4	53%	48%
Fractures of the femur and hip or pelvis	47	1,092	5	34%	36%
Gastrointestinal hemorrhage	58	4,386	4	66%	51%
Gastrointestinal obstruction	51	1,735	4	53%	47%
Hip & femur procedures except major joint	101	7,446	5	36%	26%
Lower extremity and humerus procedure except hip, foot, femur	37	1,089	6	38%	28%
Major bowel procedure	46	3,029	5	39%	37%
Major joint replacement of the lower extremity	303	97,922	6	19%	14%
Major joint replacement of the upper extremity	26	1,337	5	31%	21%
Medical non-infectious orthopedic	94	6,588	5	43%	35%
Nutritional and metabolic disorders	57	2,727	4	47%	51%
Other respiratory	62	4,700	5	42%	32%
Other vascular surgery	36	1,590	5	44%	38%
Percutaneous coronary intervention	45	4,745	5	24%	23%



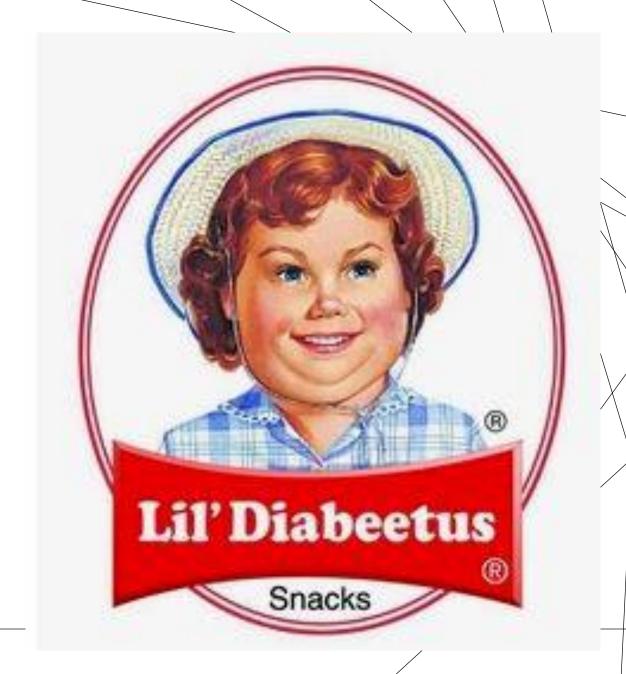
# **CMS Findings**



In the Year 3 annual report, based on the first two years of the initiative, only MJRLE had a statistically significant decline in Medicare allowed payments. The average reduction in Medicare payments across these five clinical episodes was 6.7% greater than what we would have expected without BPCI.

The statistically significant declines in total payments for the inpatient stay and 90 day post-discharge period were driven by a reduction in PAC utilization, particularly IRF and SNF use...

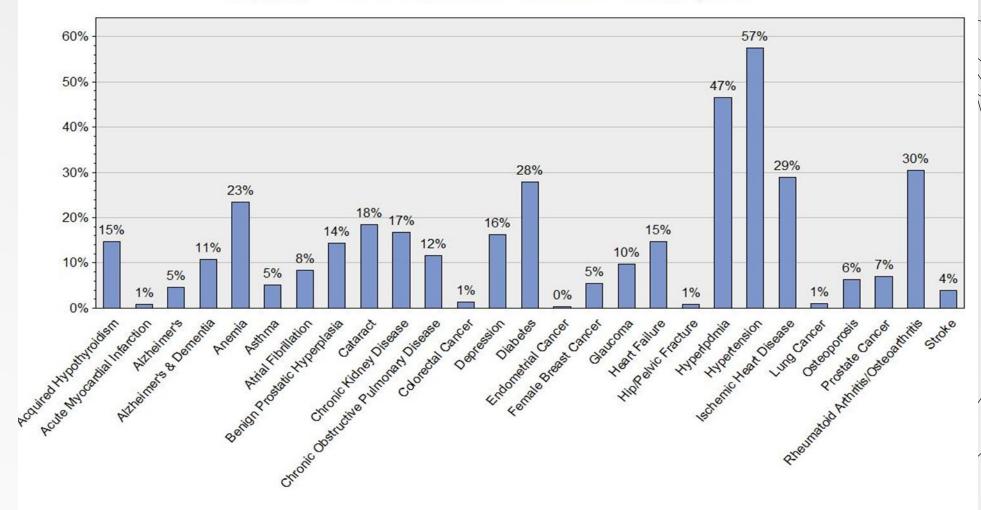
# HCC and Risk Adjustment Models



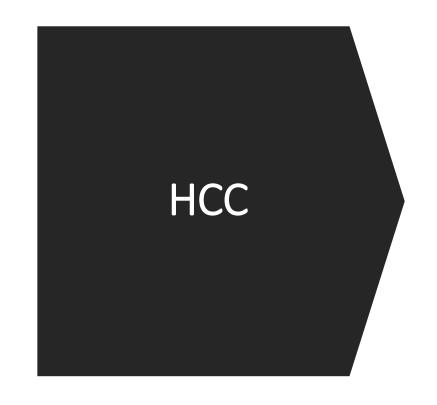
HCC/Risk Adjustment Factor This allows insurance companies an opportunity to forecast future expenditures on each patient within the risk model.



#### Medicare - CCW Condition Period Prevalence, 2013







### What is an HCC code?

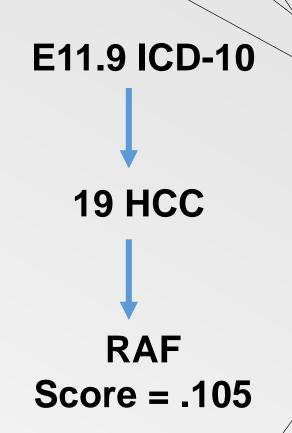
The HCC model is made up of 9,000 ICD-10 codes that typically represent costly, **chronic** diseases such as:

- Diabetes
- Chronic kidney disease
- Congestive heart failure
- Chronic obstructive pulmonary disease
- Malignant neoplasms
- Some acute conditions (MI, CVA, hip fx)

# How It Works:

#### **HCC (Hierarchical Condition Category)**

- Per CMS, the diagnosis codes are recorded per year, meaning each condition must be documented and coded each year.
- Diagnoses that demonstrate similar resource usage are categorized together.
- CMS designed the equation so that the average Medicare FFS patient has the score of <u>1.00</u>.





Equation

Add Up the total RAF score at the end of the year for a patient (don't double dip)

Multiply by the conversion factor

 $.4 \times 9,000 = 3,600$ 



# Typical Southern Medicare Patient

• HTN- I10 Risk Score = 0

• DM – E11.9 Risk Score = .105

• HPL – E78.2 Risk Score = 0

• 65 Y/O male Risk Score = .307





# Goal

1.0 - 2.0



RAF	HCC	DX	HYPERTENSION
0	NA	I <b>1</b> 0	Essential (primary) hypertension, stable
	HTN AND H	EART DIS	EASE
0.345	85	<b>I110</b>	Hypertensive heart disease with heart failure
			Use additional code for heart failure
0	NA	<b>I11</b> 9	Hypertensive heart disease without heart failure
	HTN AND C	KD	
0.288	136	I120	Hypertensive chronic kidney disease with stage 5 chronic kidney disease or end stage renal disease
			Use additional code for CKD
			Hypertensive chronic kidney disease with stage 1 through stage 4 chronic kidney disease, or unspecified chronic kidney
0	NA	1129	disease
			Use additional code for CKD
	HTN AND H	EART DIS	EASE AND CKD
			Hypertensive heart and chronic kidney disease with heart failure and stage 1 through stage 4 chronic kidney disease, or
0	NA	I130	unspecified chronic kidney disease
			Use additional code for heart failure
			Use additional code for CKD
			Hypertensive heart and chronic kidney disease without heart failure, with stage 1 through stage 4 chronic kidney
0	NA	11310	disease, or unspecified chronic kidney disease
			Use additional code for CKD
	400	14044	Hypertensive heart and chronic kidney disease without heart failure, with stage 5 chronic kidney disease, or end stage
0.288	136	11311	renal disease
			Use additional code for CKD
			Hypertensive heart and chronic kidney disease with heart failure, with stage 5 chronic kidney disease, or end stage
0.288	136/85	I132	renal disease
			Use additional code for heart failure
			Use additional code for CKD

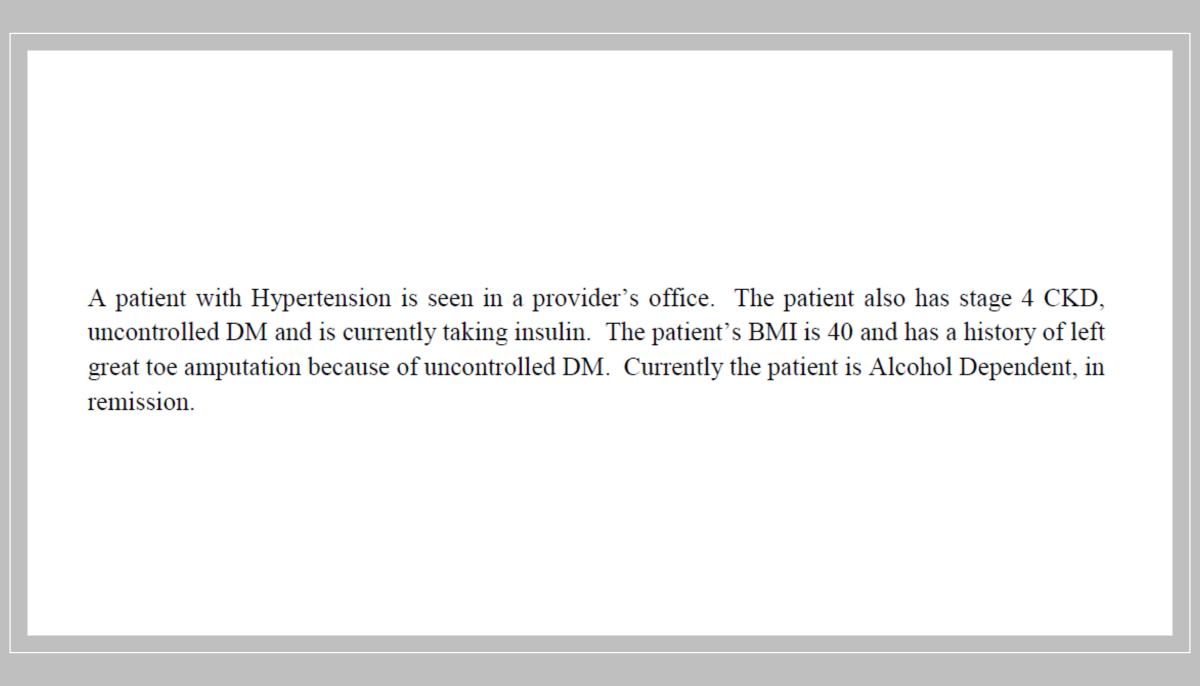


RAF	нсс	DX	TYPE 2 DIABETES MELLITUS		
0.105	19	E119	Type 2 diabetes mellitus without complications		
	TYPE 2 DM	WITH KID	NEY COMPLICATIONS		
0.305	18	E1121	with diabetic nephropathy		
0.305	18	E1122	with diabetic chronic kidney disease  Use additional code for CKD		
0.305	18	E1129	with other diabetic kidney complication		
	TYPE 2 DM	WITH NEU	JROLOGICAL COMPLICATIONS		
0.305	18	E1140	with diabetic neuropathy, unspecified		
0.305	18	E1141	with diabetic mononeuropathy		
0.305	18	E1142	with diabetic polyneuropathy		
0.305	18	E1143	with diabetic autonomic (poly)neuropathy		
0.305	18	E1149	with other diabetic neurological complication		
	TYPE 2 DM	WITH CIR	CULATORY COMPLICATIONS		
0.305	18	E1151	with diabetic peripheral angiopathy without gangrene		
0.305	18	E1152	with diabetic peripheral angiopathy with gangrene		
0.305	18	E1159	with other circulatory complications		
	TYPE 2 DM	WITH OTH	IER COMPLICATIONS		
0.305	18	E11610	with diabetic neuropathic arthropathy		
0.305	18	E11620	with diabetic dermatitis		
0.305	18	E11621	with foot ulcer  Use additional code for foot ulcer - L97 series -		
0.305	18	E11622	with other skin ulcer		
0.305	18	E11628	with other skin complications		
0.305	18	E11630	with periodontal disease		
0.305	18	E11638	with other oral complications		
0.305	18	E11649	with hypoglycemia without coma		
0.305	18	E1165	with hyperglycemia		
0.305	18	E1169	with other specified complication		
0.105	19	Z794	Long term (current) use of insulin		



RAF	нсс	DX	CHRONIC KIDNEY DISEASE
0	NA	N181	Stage 1, CKD
0	NA	N182	Stage 2, CKD
0	NA	N183	Stage 3, CKD
0.288	137	N184	Stage 4, CKD
0.288	136	N185	Stage 5, CKD
0.288	136	N186	Stage 6, CKD

RAF	HCC	DX	DIALYSIS
0.456	134	Z992	Dependence on renal dialysis
0.456	134	Z9115	Patient's noncompliance with renal dialysis



A patient with Hypertension is seen in a provider's office. The patient also has stage 4 CKD, uncontrolled DM and is currently taking insulin. The patient's BMI is 40 and has a history of left great toe amputation because of uncontrolled DM. Currently the patient is Alcohol Dependent, in remission.

TABLE 1

Diagnosis	Diagnosis ICD-10	HCC	RAF	Projected Expenditures
Hypertension	I10	NA	0	0
DM, Controlled	E11.9	19	0.105	\$983.57
Future Expenditures		0.105	\$983.57	

A patient with Hypertension is seen in a provider's office. The patient also has stage 4 CKD, uncontrolled DM and is currently taking insulin. The patient's BMI is 40 and has a history of left great toe amputation because of uncontrolled DM. Currently the patient is Alcohol Dependent, in remission.

TABLE 2

Diagnosis	Diagnosis ICD-10	HCC	RAF	Projected Expenditures
Hypertension with Stage 4 CKD	I12.9	NA	0	
Stage 4 CKD	N18.4	137	.288	
Uncontrolled DM	E11.65	18	.305	
Alcohol Dependence in Remission	F10.21	55	.344	
Long Term Use of Insulin	Z79.4	19	.105	Can't bill a 19 and 18 together
Acquired Absence of Great Toe	Z89.412	189	.521	
BMI of 40	Z68.41	22	.244	
Future Expenditures			1.702	\$15,943.21

# Final Thoughts I Share With My Clients



# Three Questions

What Percentage of the Shared Savings do You Share with your Providers?

Who Pays Me?

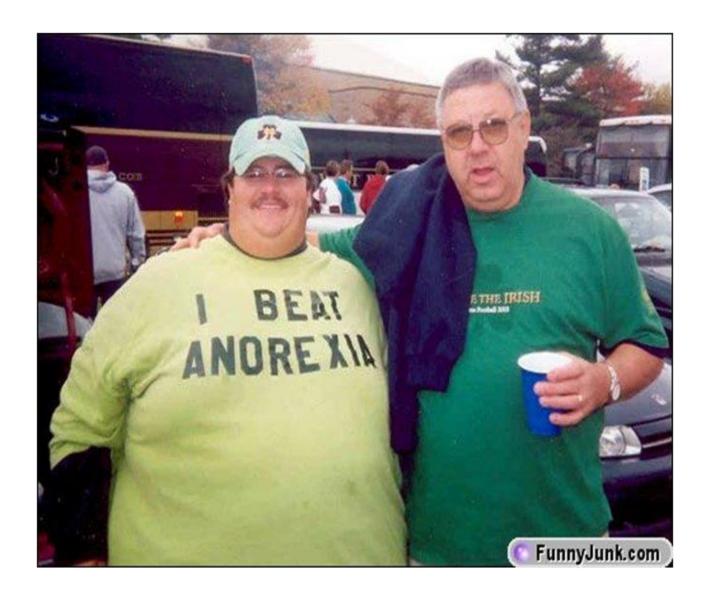
Who Controls My Patients?

## **Discussion Points**

- 1. Quality Payment Program (QPP)
- 2. Accountable Care Organizations (ACO)
- 3. Clinically Integrated Network (CIN)
- 4. Bundled Payment Models (BPM)
- 5. Risk Adjustment Models (HCC and RAF)



# Questions?



## **Any Questions**

Direct: 706-483-4728

E-Fax: 770-709-3698

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Facebook: facebook.com/kingofcoders





# SANFORD HEALTH Transforming Clinical Practice Initiative (TCPI)

Georgia Learning Community Tessi Ross, BSN, MPA, RN, CPHQ August 11, 2018

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## **TCPI** Disclaimer

"The project described was supported by Funding Opportunity Number CMS-1L1-15-003 from the U.S. Department of Health & Human Services, Centers for Medicare & Medicaid Services. The contents provided are solely the responsibility of the authors and do not necessarily represent the official views of HHS or any of its agencies."



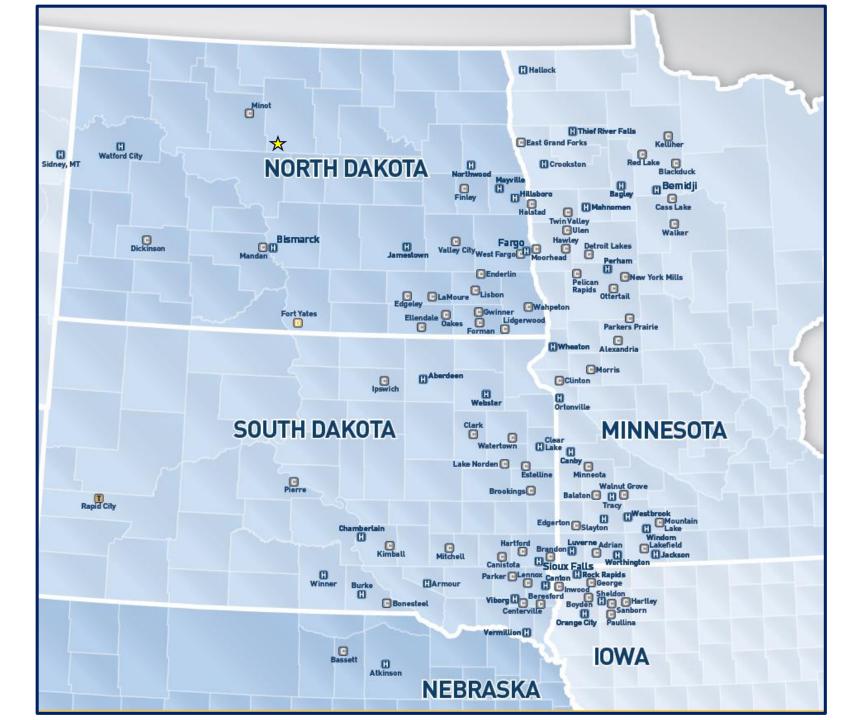
# Introduction to Sanford Health

COMPASS PTN partner organization

## **SANFORD HEALTH TODAY**







# Sanford COMPASS Team

#### Sanford Health Leadership



Molly Clark, MHA, PharmD Co-Program Manager



Tessi Ross, MPA, BSN, RN, CPHQ Program Manager

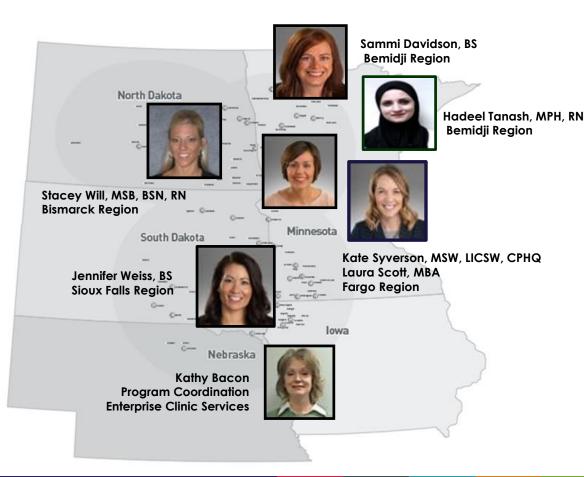


Dan Heinemann, MD Clinical Lead



Taylor Slack, MS Quality Strategist

#### **Clinic Improvement Advisors**





# Sanford Network Information

- 284 total practices
  - -113 Primary Care practices
  - -171 Specialty practices
- 1592 enrolled providers in 4 states
  - -All Sanford employees
- Enterprise Clinic & Physician Leadership sets organizational goals and initiatives
- Regional and local leaders manage operations and align to organizational strategy



# Our Transformation Approach

## Strategic Plan: Performance Improvement (PI) Plans Clinic and Clinical Services Strategic Plans

- We develop annual PI plans for each market including Hospital and Ambulatory measures.
- How do we select measures?
  - -Based on improvement needs in the areas of patient care, patient safety, and patient experience.
  - -Consistent with local, regional, and national quality agendas.
  - -Analyze payer data to determine opportunities
  - -Data driven and leadership supported
- Strategic Initiatives selected at enterprise level
- Clinic and Clinical Services Strategic Plans



#### TCPI AIMS/GOALS

- 1.) Support clinicians in their practice transformation work
- 2.) Build evidence on practice transformation so that effective solutions can be scaled
- 3.) Improve health outcomes for millions of Medicare, Medicaid, and CHIP beneficiaries and other patients
- 4.) Reduce unnecessary hospitalizations

#### 5.) Sustain efficient care delivery by reducing unnecessary testing and procedures

- 6.) Generate cost savings to the federal government and commercial payers
- 7.) Transition practices into Alternative Payment Models

#### PRIMARY DRIVERS

**SECONDARY** 

DRIVERS/

**TACTICS** 

#### Patient & Family-Centered Care

#### Workflow Redesign

-Rooming Standardization -Co-Visits

#### Team-Based Care

-Daily Huddles w/team -Behavioral Health Integration -Pharmacy Integration

#### **Population Health Registries**

-Preventative Screenings -Chronic Disease -Rising-Risk & High-Risk

#### Care Management Strategy

Advance Care Planning

#### Self-Management Programs

-Diabetes Prevention
-Better Choice Better Health

#### Sanford Experience

-Real-time Feedback
-Leader Rounding Strategy
-Communication & Empathy
Training
-PFAC Strategy
-Retrospective Surveys

#### EMR Integration & Patient Portal Access

Mental Health First Aid

#### Continuous, Data-Driven Quality Improvement

#### Annual Performance Improvement (PI) Plans

#### Clinic Quality Dashboard

-Provider & Practice level data transparency -Standard Patient Attribution Methodology

#### Physician & Executive Portals

Clinic Visibility Boards

Improvement Advisors

**Quality Strategy Team** 

Sanford Improvement Model

#### Sanford Improvement Academy

-PI Boot Camps
-Leading For Improvement

#### **Clinical Standardization**

-Clinical Practice Guidelines -Standard Treatment Regimens -Nurse driven protocols

#### Value Improvement Workgroups

-Clinical Excellence

#### Sustainable Business Operations

#### Operational Performance Review

#### Payer Program Alignment

AMGA Staffing Mix Improvement

#### Same Day at Sanford & Family Medicine Walk-In Strategy

#### **Alternative Visit Types**

-E-visits, Video visits, group visits

Care Management Strategy

Post-Acute Care Coordination

TCM & Post-discharge follow up

#### Standard Annual Budget Process

Recognition Toolkit

Employee of the Year

**Annual Nursing Awards** 

Daily Nurse Award (Clinics)

Hero Awards

New Revenue Sources

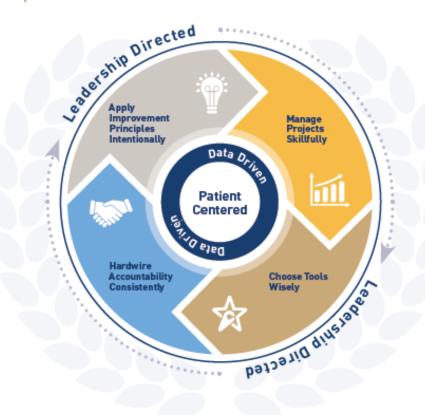
# **Data Transparency**

- Prioritize internal data availability for PI plan measures
- Quality Dashboard
- Visibility Boards
- Executive and Physician Portal
- Sanford Improvement Symposiums
- Epic Dashboards (future state)



# Sanford Improvement Model

#### Sanford Improvement Model





# Improvement Advisor Role



- Partner with leadership to organize, assist, and coordinate planning and implementation of improvement strategies
- Engage with clinic care teams to enhance awareness of quality measures, develop improvement strategies and spread best practices
- Collaborate and coach leaders throughout the organization on improvement principles/methodology



### Improvement Strategies

- Measure Education and Improvement Strategy Documents
  - -Hypertension Control
  - -Optimal Diabetes Care
  - -Optimal Vascular Care
  - -Optimal Asthma Control
  - -Asthma Education and Self-Management
  - -BMI Screening & Follow-up Plan
  - -Depression Remission at 6 & 12 months
  - -Depression Screening & Follow-up Plan
  - Breast Cancer Screening
  - -Colorectal Cancer Screening
  - -Cervical Cancer Screening

### SANFORD

#### Colorectal Cancer Screening Improvement Strategies

<u>Goal:</u> Share improvement among Sanford Health Clinics <u>Method:</u> Best practice improvement strategies previously utilized by top performers

#### Process

- Care Team updates Health Maintenance at every visit
- Use of Preventative Screening workflow (in development)
- Use of standard protocol orders and clinical practice guidelines
   Clinical Staff to prep and pend orders per standardized protocol
- Identify Care Team members to identify patients not meeting goal (ex. manage registries, specific daily chart prep, and following up with patients, etc.)
- Provider reinforces the importance of preventative health maintentance with all patients
- o Maintain a current referral list for community resources
- Engage patients in use of self referral and MyChart (ex. patient reminders/due dates, patient selfscheduling, etc.)
- o Patient reminder phone calls

#### Education/Awareness

- Education to staff on use of Enterprise Preventative Screening workflow (in development)
- o March Colorectal Cancer Awareness month
- o Options and proper use of Colorectal Cancer Screening methods ( colonoscopy, FIT , FIT- DNA )

#### Data

o Transparency of data- data is displayed in the clinic



### **Success Stories**

Hypertension Control & Depression Remission

### **Excellence in Hypertension Control**

### Sanford and COMPASS PTN goal:

- ✓ Improve Hypertension Control (<140/90)
- ✓ Collaborate with clinic teams to assess current state; develop, educate and implement best practices; monitor improvements to achieve and sustain high-performance

### Sanford Journey:

- Began our initiative in 2013-2014
- Blood Measure Measurement Standardization
  - Started in a single regional market (Fargo), spread to all markets by the beginning of 2015
  - Education to front-line clinical staff on the importance of obtaining accurate blood pressure measurements
  - Implementation of standard process for blood pressure measurement to ensure accuracy of measurements across all clinics
  - Implementation of the blood pressure measurement algorithms in all clinics
- Future interventions became more robust and widespread
- <u>Lessons learned:</u> Start small, then spread; Start with one change



### Hypertension Control Interventions

- Use of Clinical Practice Guidelines and RN Protocols for Hypertension treatment
- Development/utilization of Healthy Planet patient registry in our electronic medical record to identify individuals not meeting hypertension goals and initiate patient outreach
- Real-time notification of patients not meeting optimal goals (i.e. EMR Best Practice Alerts, huddles)
- Identify patients who are not reaching optimal care goals and who are appropriate for health coaching taking into account patient readiness
  - · Utilization of Motivational Interviewing, working with patient to develop goals
  - Development and personalization of a care plan with patient and family (when appropriate)
  - Consideration of depression and/or behavioral health screening tools or IHT referral
  - Addressing substance abuse concerns
  - Identification of appropriate care team members to follow-up with patients not meeting goal
- Aggressive treatment and targeting of patients who are close to goal
- Drawing lab work prior to appointments
- Personalizing follow-up treatment plans when goals not met
- Scheduling follow-up appointments prior to leaving the clinic
- Data transparency



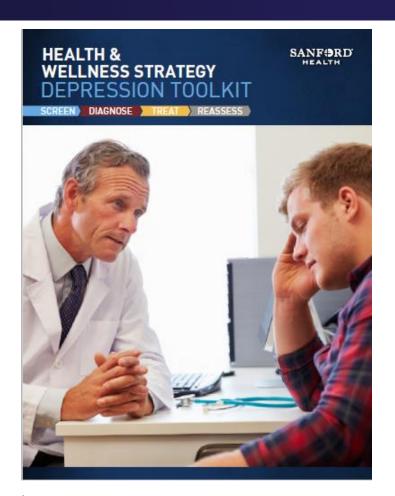
### Hypertension Control Performance

- 2017 Million Hearts Hypertension Control Champion by the CDC & CMS
- 86.11% in 2015 and now at 88.6% in 2018 (d=153,129)
  - -Improved HTN control for over 5,000 patients
  - Better control of blood pressure has been shown to significantly reduce the probability that undesirable and costly outcomes occur
    - Stroke, MI, Heart Failure
- Decision to stay at 140/90 for internal clinical practice guidelines





# Health & Wellness Strategy: Depression Toolkit



Collective obligation to provide our patients with pathways to achieving a positive lifestyle

- > Screen
  - ➤ Diagnosis
    - **≻**Treat
      - ➤ Reassess

At Sanford Health, approximately **7.83%** (n=47,779) adult patients aged 18+ had an encounter dx of major depression in the past year



# Health & Wellness Strategy Depression Toolkit

- 1) Understand the Why
- 2) Measurement Overview
- 3) Diagnostic Precision
- 4) Improvement Strategies
- 5) Clinical Practice Guidelines
- 6) Patient Engagement
- Cross-Cultural Considerations

#### THE WHY BEHIND DEPRESSION CARE 6.7 percent of U.S. adults ROLE OF PRIMARY CARE had at least one major 70 to 80 percent of all depressive apisode in patients with depression will the past year!. get their care exclusively in primary care clinics. Although treatment 12.5 percent of U.S. is associated with high Nearly 80 percent of all adolescents aged 12-17 psychopharmacological agents SUCCESS Fates. had at least one mains are prescribed 75 to 80 percent of depressive episode in by primary care garients either do not the past years. seek or are not receiving dinicians proper treatment. eone is considering suicide, get help from a crisis or suicide p National Suicide Prevention Lifeline at 1-800-273-8255(TALK) BY THE NUMBERS? IMPACT OF DEPRESSION saying salway or sleeping upon making decisions Depression is the leading · Unemisized achievard ruins cause of disability. - Debitsming fadger PHYSICAL -. Increased risk of chross: presentation and wheelp + Subsumo strate weighs changes Depression is associated with a two-fold increase - Express trivability over . Fittation on the man or on minor chings. shirter she have pore wrong in health rare costs Antisyand realisation · Thoughe of deals and **EMOTIONAL** - Anger management boom + Unusual crying or concluinous - Loss of Investor in Severier Pemales are almost applyshing. three times more likely Champleyman · Reduced productivity than males to have - Doubley · Alternation from actool/ SOCIAL depression. - Waltdrawal or polarion - Silgers DEPRESSION RISK FACTORS AND INTERVENTIONS · Past depression or family member with depression · Rule out other health conditions · Low self astrom · Behavioral activation Substance abuse disorders · Major life change such as divorce or job loss · Psychotherapy · Brain stimulation therapies Trauma or abose · Physical illnesses · Certain medications · Lack of social support network Acute and chronic psychosocial stress PAGE 2



### Results

### **Enterprise Rates Improved for both measures:**

	Jun-16	Jun-17	June-18
6 Month Remission	8.02%	10.80%	11.3%
12 Month Remission	N/A	7.45%	10.2%

#### 6 months:

June 2016 (968/12071)

June 2017 (1257/12343)

June 2018 (1237/10919)

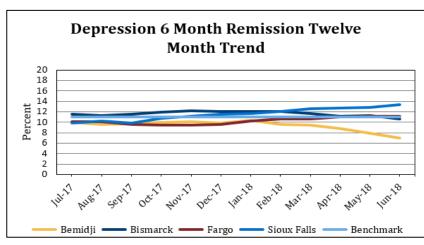
### 12 months:

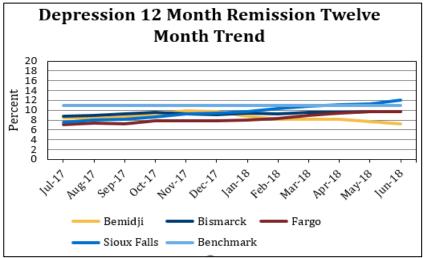
June 2017 (868/11578)

June 2018 (992/9709)

\*Note the decline in denominator = due to improved diagnostic precision and change to ICD10









# WE'VE GOT YOUR BACK SIDE

SANF#RD

Sammi Davidson, BS, Improvement Advisor, Sanford Health; Tessi Ross, BSN, MPA, RN, CPHQ, Senior Quality Strategist, Sanford Health

### **Learning Objectives**

- Describe our commitment to the National Colorectal Cancer Roundtable 80% by 2018 initiative
- Recognize system and clinical improvement strategies to increase colorectal cancer screening rates
- Evaluate results in performance

### Objective

Sanford Health will reach 80% in colorectal cancer screening rates by Dec. 31, 2018 in alignment with the National Colorectal Cancer Roundtable initiative.

#### **Background**

Colorectal cancer is the second leading cause of cancer death for men and women in the United States and has become a national public health initiative. We recognized that to improve our screening, a one-size-fits-all approach would not work. We sought ways to use nursing and other care staff beyond physicians to improve our screening rates. The goal was to get more people screened, make the largest impact we could to detect colorectal cancer and ultimately save lives.

#### **Actions Taken**

- Offer multiple screening methods to patients
- · Reduce structural barriers for patients
- Optimize EMR to include clinical team reminders and utilization of a recall system
- Implement provider assessment and feedback initiatives
- Implement FluFIT pilots
- Improve data transparency
- Collaborate across entire organization

#### Data

#### Measurement:

- MNCM specifications
- Ages 50-75 up to date with colorectal cancer screening

#### Methodology:

- Sanford Improvement Model
- PDSA, Report Outs
- Process/workflow mapping

#### **Analysis**

- As of February 2018, 12 of Sanford Health's primary care clinics are exceeding the 80% screening goal
- Current screening rate at 73.6%, increase of 4.9% from 2015
- Increase of over 15,000 patients receiving screenings since 2015
- Organization is the inaugural recipient of the Organization of the Year for the 2018 North Dakota Colorectal Cancer Screening Achievement Awards given by the North Dakota Colorectal Cancer Roundtable

#### **Next Steps**

- Continue to spread best practices across all clinics
- Provide focused improvement advisor support to low performing clinics
- Implement FIT mailing pilot
- · Identify patients needing early screening
- Increase public awareness of colorectal cancer screenings importance

# **Exemplar Practice**

# Sanford Health Fargo Children's Clinics

### Introduction

- -Provides care for over 25,500 patients & PCMH Certified (Patient-Centered Medical Home)
- Active Patient and Family Advisory Council
- -Provides multi-disciplinary care
  - RN Health Coach, Social Worker, IHT, Respiratory Therapist, Panel Assistant
- -Integrated with multiple Pediatric Specialty providers
  - Cardiology, Endocrinology, General Surgery, Oncology, Rheumatology, Infectious Disease, Orthopedics

### Outstanding Achievement

- -Well Child Visits First 15 Months NDBCBS Fargo Region Data
  - Baseline rate 65.4%, Current Rate 72.4%
  - Around 70% of the NDBCBS patients eligible for Well Child Infant visits are attributed to Fargo Children's Clinics

#### -Asthma

- Optimal Asthma Control: Baseline rate 70.3%, Current Rate 73.9%
- Asthma Action Plan: Baseline rate 66.2%, Current Rate 74.1%
- Use of Appropriate Medications for Asthma 68% to 80% (\$247,136.94 cost savings)





# Closing Remarks

### Phase Progression Analysis

- Graduated 22 practices into an APM on January 1, 2018
  - -Comprehensive Primary Care Plus (CPC+)
- Phase Breakdown after our June 2018 follow-up PAT submission:

Phase	Practice Count
Phase 1	0
Phase 2	40
Phase 3	55
Phase 4	156
Phase 5	33



### Rural Challenges & Approach

- Enderlin Clinic, ND (population 868)
  - Expanded hours to meet the needs of the plant
- Mountain Lake Clinic, MN (population 2,102)
  - Mammo truck one person fills the schedule
- Ellendale Clinic, ND (population 1,286)
  - Oakes Mammo truck shifted to Ellendale
- FIT Mailing Pilot
- Community Fridge Partnership



### Key Takeaways

- Transforming Clinical Practice is a marathon
  - -Organize, empower, and nurture your TEAM
    - Develop a strategic plan
      - -Start somewhere and start small grow from there
    - Right care, Right time, Right person
    - Educate and train your team
      - -Examples: Health Maintenance Protocols, Co-visits
  - -Daily huddles and regular team meetings
  - -Incorporate new roles into your clinics
    - Partner with tele-services in rural settings
  - -Engage and activate your patients
  - -Optimize the use of your EMR
  - -Use data to drive improvement
  - -Celebrate with your team





# Questions??







## Moving to an ACO - Lessons Learned

Antonio Rios, M.D., FACP, CPE Chief Physician Executive

Improving the health of our community in all we do.



### **NGPG**

- 330+ providers (220 physicians and 110 APP's
- 26 specialties, medical and procedural, inpatient and outpatient
- Achieved MIPS score of 99.24% with an upward adjustment of 1.98% (TCPI work is paying off!)



### NGPG's Current State

- The Medicare Shared Savings Program (Shared Savings Program) facilitates coordination among providers to improve the quality of care for Medicare fee-for-service beneficiaries while reducing the growth in health care costs.
- NGPG joined in creating our local HP2 (CIN) ACO, and began participating as a group 1/1/18.
- 2018 is a reporting year. 2019 will be our first performance year.
- NGPG is currently in the process of operationalizing quality for optimal performance in 2019.



### Lessons Learned...





# Identify data needs and resources

- Find out what successful ACOs know:
  - Annual Wellness Exams
  - HCC Coding to drive better quality performance and higher savings
  - You'll need analytics of ALL the data you have



### Lessons learned...

- Look at prior MIPS performance scores to identify risk for ACO performance challenges
- Identify the ACO measures that pertain to your first year (reporting measures only) and your 2<sup>nd</sup> year (has BOTH reporting and performance measures)



# Build your data structure

- Identify reporting needs
- Robust validation of data during reporting year
- Design and test intervention plans for when metrics are heading in wrong direction



# Build your data structure

- Have a quality professional or other subject matter expert work closely with IT to ensure correct CMS numerator/denominator definitions.
- Share the measure definitions with all staff



Percentage of patients 18 to 85 years of age who had a diagnosis of hypertension and whose blood pressure was adequately controlled (<140/90 mmHg) during the measurement period (Jan.  $1^{st}$  to Dec.  $31^{st}$ ).

Numerator

Patients whose blood pressure at the most recent visit is adequately controlled (systolic < 140 mmHG and diastolic < 90 mmHG) during the calendar year.

Denominator

Patients 18-85 years of age who had a diagnosis of essential hypertension within the first 6 months of the calendar year or any time prior to January  $1^{st}$ .



Percentage of patients aged ≥ 12 years screened for depression on the date of the encounter using an age appropriate standardized depression screening tool *AND*, *if positive*, a follow-up plan is documented on the date of the positive screen.

Numerator

Patients screened for depression on the date of the encounter using an age appropriate standardized tool, AND, if positive, a follow-up plan is documented on the date of the positive screen.

Denominator

All patients aged  $\geq$  12 years before the beginning of the measurement period (January 1<sup>st</sup> through December 31<sup>st</sup>) with at least one eligible encounter during the measurement period.



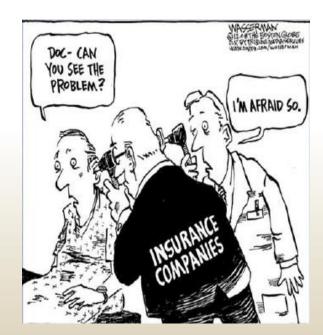
# Educate, Educate, Educate

 Assume most providers don't truly know much about Accountable Care

Organizations

 ACOs are run by providers, not insurance companies

Staff needs to be educated





# Educate: Stop the Rumors Early

- Rumor: ACOs don't improve quality.
  - Fact: ACOs outperformed published benchmarks for quality and patient experience.
- Rumor: CMS won't give money back.
  - Fact: ACOs generated over \$372 million in savings while improving patient care. The ACOs qualified for \$445 million in shared savings payments.



# Educate: Stop the Rumors Early

- Rumor: It's a fad, let me get back to work.
  - Fact: CMS announced that 99 more ACOs have joined the ACO Shared Savings program in 2017. 79 ACOs renewed their participation bringing the total number of Medicare Shared Savings ACOs to 572.



# Educate, Educate, Educate

- Providers need education on what impacts the outcome at the end of the year, and how shared savings are calculated
  - Is it care coordination or patient safety?
  - Is it preventive health?
  - Is it population health?
  - Is it patient experience?





# Data, and More Education

- Involve providers in identifying improvement opportunities
- Empower quality and operations leaders to intervene when metrics are moving in the wrong direction (IT or process flow)
- Re-educate and coach staff to standard work
- Assist in IT prioritization
- Revise standard work as necessary



## Data, and More Education

- Be transparent in sharing patient experience data
- Let providers learn from each other best practices
  - Collaboratives
  - PODS (by region or specialty)
  - "Encourage" participation via Q&C bonuses