

Medicare Accountable Care Organizations: Presence in Rural America

Webinar Presentation - Session 3

Rural Northern Border Healthcare Support Technical Assistance Center

June 6, 2023

By

Keith J Mueller, PhD

Director, Rural Policy Research Institute





Member, Rural Health Value Project Team

Landscape: Federal Policy Goals

- Getting to categories 3 and 4 of HCPLAN model: alternative payment models with both upside shared savings and downside risk; population-based payment
- Federal policy goals to reach 100% of beneficiaries in an advanced payment model by 2030 – applied to both Medicare (directly) and Medicaid (through letters to state Medicaid directors)
- Specific actions
 - Medicare Shared Savings Program – the program, not demonstrations
 - Other designs to shift downside risk to providers (global budgets, direct contracting, i.e. ACO REACH)
 - Eye on the prize: quadruple aim



Health Care Payment Learning and Action Network (HCP LAN) Alternative Payment Model Framework

			
CATEGORY 1 FEE FOR SERVICE – NO LINK TO QUALITY & VALUE	CATEGORY 2 FEE FOR SERVICE – LINK TO QUALITY & VALUE	CATEGORY 3 APMS BUILT ON FEE-FOR-SERVICE ARCHITECTURE	CATEGORY 4 POPULATION – BASED PAYMENT
	A Foundational Payments for Infrastructure & Operations <small>(e.g., care coordination fees and payments for HIT investments)</small>	A APMs with Shared Savings <small>(e.g., shared savings with upside risk only)</small>	A Condition-Specific Population-Based Payment <small>(e.g., per member per month payments, payments for specialty services, such as oncology or mental health)</small>
	B Pay for Reporting <small>(e.g., bonuses for reporting data or penalties for not reporting data)</small>	B APMs with Shared Savings and Downside Risk <small>(e.g., episode-based payments for procedures and comprehensive payments with upside and downside risk)</small>	B Comprehensive Population-Based Payment <small>(e.g., global budgets or full/percent of premium payments)</small>
	C Pay-for-Performance <small>(e.g., bonuses for quality performance)</small>		C Integrated Finance & Delivery Systems <small>(e.g., global budgets or full/percent of premium payments in integrated systems)</small>
		3N Risk Based Payments NOT Linked to Quality	4N Capitated Payments NOT Linked to Quality

Source: <http://hcp-lan.org/workproducts/apm-framework-onepager.pdf>

Shared Savings Program

Plateau of 561 in 2018, fell to 456 in 2023



Composition in 2023

252 low revenue (55%)

2,240 Rural Health Clinics

467 Critical Access Hospitals

One-sided: 33% (151)

Two-sided include 144 in basic tracks, 161 in enhanced track

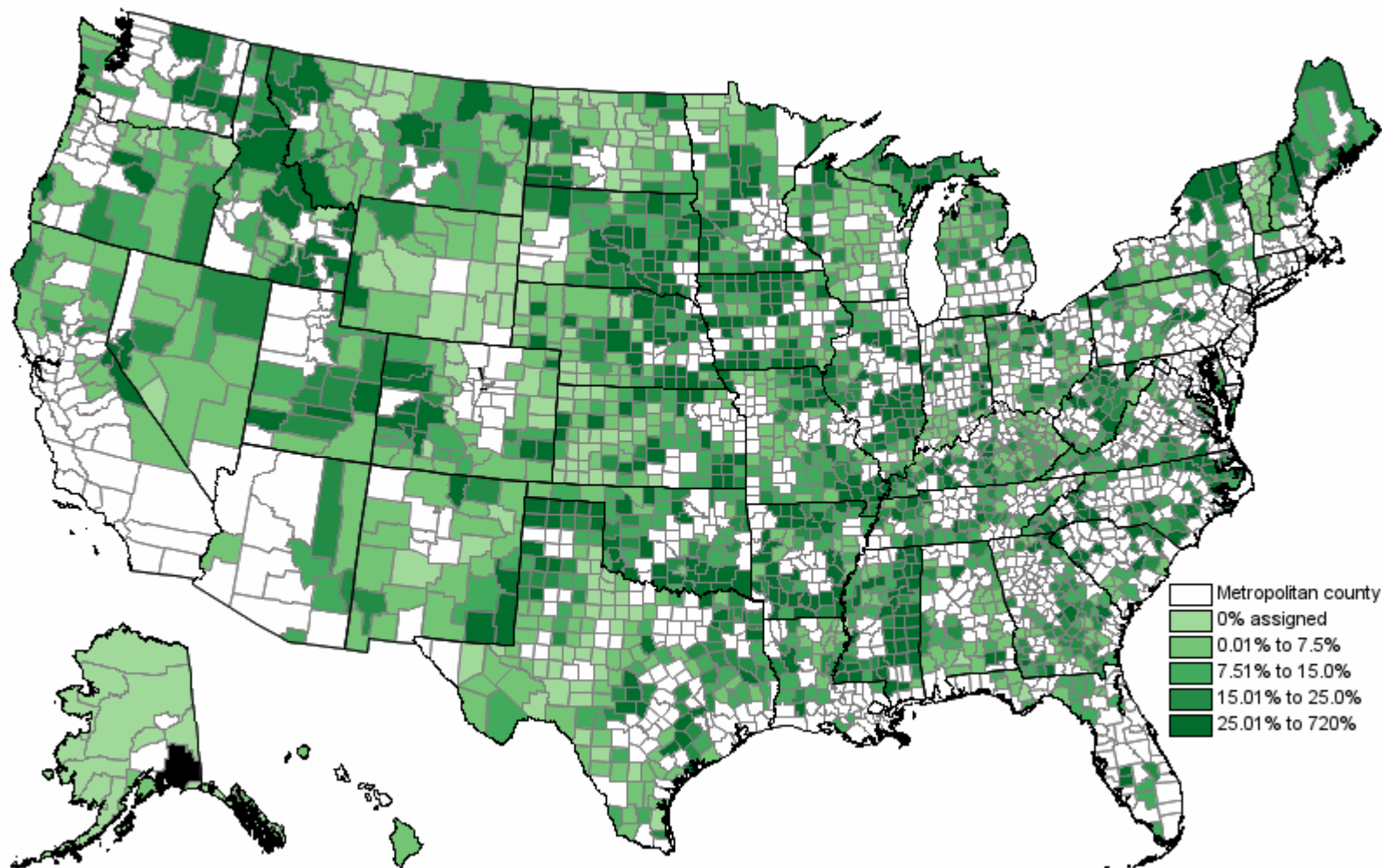
Source: CMS: Savings Program Fact Facts – As of January 1, 2023

ACO Spread - 2023

Medicare Shared Savings Program ACO Assigned Beneficiary Population by Rural County

Note: This lists the Beneficiaries Assigned to an MSSP ACO by Rural County

In 2023, 467 CAHs are part of an MSSP ACO



SSP Changes 2023 for 2024

- Longer time in Basic track A, for inexperienced ACOs: (upside risk only): up to 7 years
- Advanced Interest Payment: one-time \$250,000 and quarterly per-beneficiary payments for first 2 years
- Changes to minimum savings rate (MSR) to allow shared savings at half regular rate until MSR is met
- Introduce Accountable Care Prospective Trend to adjust benchmarks calculated based on national and regional rates
- Reduce Negative Regional Adjustment Cap from 5% to 1.5%

SSP Changes 2023 for 2024

- Adjustment for Prior Savings: Adding back into benchmark a portion of savings generated by ACOs
- Risk Score Growth Cap Adjustment: allow flexibility within a 3 percent cap on growth in the risk score
- Sliding Scale for Shared Savings and Losses: allow percentage of shared savings when ACO quality performance is below 30th percentile but at least in 10th percentile in of four outcome measures

Source: Medicare Shared Savings Program: Rule Changes and Implications for Rural Health Care Organizations. *Rural Health Value Policy Brief*. 2022.
<https://ruralhealthvalue.public-health.uiowa.edu/files/RHV%20MSSP%20Rule%20Changes%20and%20Implications.pdf>

SSP Changes 2023 for 2024

- Longer time in Basic track A, for inexperienced ACOs: (upside risk only): up to 7 years
- Advanced Interest Payment: one-time \$250,000 and quarterly per-beneficiary payments for first 2 years
- Changes to minimum savings rate (MSR) to allow shared savings at half regular rate until MSR is met
- Introduce Accountable Care Prospective Trend to adjust benchmarks calculated based on national and regional rates
- Reduce Negative Regional Adjustment Cap from 5% to 1.5%

SSP Changes 2023 for 2024

- Adjustment for Prior Savings: Adding back into benchmark a portion of savings generated by ACOs
- Risk Score Growth Cap Adjustment: allow flexibility within a 3 percent cap on growth in the risk score
- Sliding Scale for Shared Savings and Losses: allow percentage of shared savings when ACO quality performance is below 30th percentile but at least in 10th percentile in of four outcome measures

Source: Medicare Shared Savings Program: Rule Changes and Implications for Rural Health Care Organizations. *Rural Health Value Policy Brief*. 2022.
<https://ruralhealthvalue.public-health.uiowa.edu/files/RHV%20MSSP%20Rule%20Changes%20and%20Implications.pdf>

Landscape: State Policies

- Medicaid payment policy, including requirements built into contracts with Managed Care Organizations (MCOs) – 29 require MCOs to implement VBP models; 26 define the types of VBP models
- State regulatory policies facilitate or inhibit change
- CMS role of transmittal letters to state Medicaid directors:
 - ✓ January 7, 2021, letter re opportunities to address SDOH
 - ✓ January 4, 2023, CMS guidance re SDOH waivers

Sources: Most States Require Managed Care Organizations to Implement VBP Models with Providers. *Insights* Guidehouse. July 19, 2022. <https://guidehouse.com/insights/healthcare/2022/blogs/managed-care-implement-vbp-models?lang=en>



For further information

- The RUPRI Health Panel <http://www.rupri.org>



- The RUPRI Center for Rural Health Policy Analysis
<http://cph.uiowa.edu/rupri>



- Rural Health Value <http://www.ruralhealthvalue.org>



Keith J. Mueller, PhD

**Gerhard Hartman Professor of Health Management and Policy
Director, Rural Policy Research Institute (RUPRI)**

Member, Rural Health Value Project Team

University of Iowa College of Public Health

145 Riverside Drive, N211, CPHB

Iowa City, IA 52242

Office: 1-319-384-3832

keith-mueller@uiowa.edu

