

HPC ACO Certification Program

2019 Application Requirements Overview Webinar

6/27/2019



AGENDA

- Overview and Approach
- Criteria for Certification
 - Background Information
 - Assessment Criteria
 - Supplemental Information Questions
- Process and Timeline
- Q&A

HPC ACO Certification aims to promote ongoing transformation and improvement over time

Current market	 Multiple ACO programs in the market Medicare ACOs (i.e., MSSP, Next Gen) Commercial programs (e.g., BCBSMA's AQC) MassHealth ACOs Evidence on the relationship between ACO capabilities and outcomes is still developing
Initial focus of HPC ACO Certification	 Create a set of multi-payer standards for ACOs to enable care delivery transformation and payment reform Build knowledge and transparency about ACO approaches Facilitate learning across the care delivery system Align with and complement other standards and requirements in the market, including MassHealth, Health Connector, and Dept of Public Health (DPH) requirements
Vision for Future Certification	 Develop the evidence base on how ACOs achieve improvements in quality, cost, and patient experience Move certification standards from structural/process requirements to quality outcomes and cost performance requirements Encourage additional payers and purchasers to adopt certification
IPC	standards

HPC ACO Certification Linkages to Other State Initiatives



MassHealth ACO Program

ACOs participating in the MassHealth ACO program are required by MassHealth to achieve and maintain HPC certification. HPC collaborates with MassHealth to ensure that certification standards align with MassHealth ACO requirements, and to minimize reporting burden where feasible.

Health Connector Approach

Under the 2020 Seal of Approval process, the Health Connector is allowing plans to deviate from standardized designs by reducing enrollee costs for select high-value providers.





Revised DoN Regulation (105 CMR 100.000)

No person shall be issued a DoN for new construction of ambulatory surgery capacity (on-campus or freestanding) without first becoming or entering into a joint venture with an HPC-certified ACO.

HPC ACO Certification Program Activities 2017-2019



Reported on ACO activities

1 webinar on serious illness care

3 policy briefs

Offered new opportunities

TA program: adviseRx

upcoming investment program: MassUP

ACO Certification Reporting

An Introduction to ACOs in Massachusetts			
ATTREEZEDE ACCO POLICY BRIEF Transforming Care: An Introduction to Accountable Care Organizations in Massachusetts	 Provides background information and highlights key facts about the certified ACOs, such as: The certified ACOs hold more than 65 commercial risk contracts, 17 MassHealth risk contracts, and 11 Medicare risk contracts. Over 80% of ACOs have at least one hospital as an ACO participant. 		
How ACOs in MA Manage Pop	oulation Health		
SERVIENCE: ROOTE BRIEF ACCO POLICY BRIEF Transforming Care: How ACOs in Massachusetts Manage Population Health	 Describes activities performed by the HPC-certified ACOs related to: Risk stratification Assessment of patient needs and preferences Population health management programs that address behavioral health and the social determinants of health 		
Risk Contracts and Performar	nce Management		
EXTREZORS ACO POLICY BRIEF Transforming Care: Risk Contracts and Performance Management Approaches of Massachusetts ACOs	 Describes ACO approaches to risk contracting and performance management, including: Number of quality measures in use Generation of performance reports for providers Factors considered in the distribution of shared savings 		
Profiles of the 2017-2019 HPC	-certified ACOs		
HEALTH POLICY COMMISSION ACC CERTIFICATION PROGRAM ACCOUNTABLE CARE ORGANIZATIONS IN MASSACHUSETTS: PROFILES OF THE 2017-2019 HPC-CERTIFIED ACOS	 Provides a snapshot of the ACOs using information from ACO Certification and other public data (e.g., from the Registration of Provider Organizations program), including key facts about: Payers with whom the ACO has risk contracts; Where in the Commonwealth the ACO provides care; and The ACO's approximate patient count. 		
HPC			

Summary of Key Changes in the 2019 ACO Certification Requirements and Platform User Guide (PUG)

PUG Element	Changes for 2019	
Applicant / Component ACOs	*Clarification* Applicant has partial or complete common ownership or control of all contracting entities; all Component ACOs must be included in the application	
Intent to Apply / Pre-Req. Attestations	1 Substantive, Quality-based Risk Contract	
Information for Public Reporting	ACO Participants; year each risk contract begins/ends, # of attributed patients, whether contract takes downside risk; Org chart of Governance Structure	
Background Information	*New Section* Optional ACO Participants upload; Risk Contract Information template	
Assessment Criteria	Quality-Based Risk Contracts questions moved to Background Information and pre-requisites; no other changes	
Supplemental Information	Three question domains (down from nine in 2017)	

HPC Please note that this slide is a summary only; please review the full PUG for additional important details on these and other 2019 certification requirements.

HPC Commitment to Reduce Administrative Complexity









Definition of the Applicant for Certification

Overview

The Applicant must be the health care provider or provider organization that has **partial** or complete common ownership or control of any and all corporately affiliated contracting entities that enter into risk contracts on behalf of one or more health care providers (Component ACOs).

Example



- ABC ACO holds risk-based contracts with commercial payers
- ABC also owns a Medicare ACO, which contracts directly with Medicare and has a separate Governing Body
- ABC owns and operates an ACO that holds a contract with MassHealth

ABC ACO is the Applicant and, if all criteria are met, will be certified *inclusive* of its component Medicare and MassHealth ACOs





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Overview of 2019 ACO Certification Criteria

	Pre-requisites			
5 pre-reqs. Attestation only		 Risk-bearing provider organizations (RBPO) certificate, if ap Any required Material Change Notices (MCNs) filed Anti-trust laws Patient protection Substantive, quality-based risk contract 	plicable	
	1	Background Information		
2 required criteria Risk contracts template, quality reporting		 ACO Participants – primary care and hospital (optional) Risk contract information Risk contract performance 		
2 Assessment Criteria *NEW*			*NEW*	
5 criteria Sample document narrative descriptions	s,	 Patient-centered, accountable governance structure Population health management programs Cross-continuum care: coordination with BH, hospital, spec care services 	Attestation Option	
	3	Required Supplemental Information		
3 criteria Narrative or data Not evaluated by HPC but must respond		 Distributes shared savings or deficit in a transparent manne Addresses low-value care delivery Supports patient-centered primary care and behavioral heal 		

Pre-requisites

ACO must attest to the following:

ACO has obtained, if applicable, a **risk-bearing provider organization (RBPO)** certificate or waiver from **DOI**.

ACO has filed all required Material Changes Notices (MCNs) with the HPC.

ACO is in compliance with all federal and state antitrust laws and regulations.

ACO is in compliance with the HPC's **Office of Patient Protection (OPP)** guidance regarding an **appeals process to review and address patient complaints** and provide notice to patients.

ACO has at least one **Substantive**, **Quality-based Risk Contract** with a public or private payer in the Commonwealth.



ACO Participants - Optional

Optional responses:

- List of participating primary care practices (site level) and hospitals
- Narrative of any differences between the providers that participate in each risk contract

HPC will reference MA-RPO program data if the Applicant chooses not to provide this information. HPC may ask the Applicant to review its MA-RPO data

Risk Contracts and Performance

- Details of each risk contract, including payer, number of covered lives, years in contract, and financial terms (e.g., full or partial risk, max. shared savings/losses, etc.) Template provided
- For the two most recent performance years, final ACO-level quality performance on all measures included in risk contracts – No template



Background Information: Risk Contract Information Template

			1	HPC ACO Certification	
			Applicant O	erview Template 1: Risl	c Contracts
Applicant:					
Component ACO					
(if applicable):					
Name of payer Add rows as necessary	Product	Fully-insured or self-insured?	Number of years risk experience with this payer	Year current contract began; year current contract expires	Number of attributed patients/covered lives
Medicare	Next Generation ACO	Fully-insured	8	2016; 2018	20,000
		Self-insured			
		Both			

		Financia					
Full or partial risk contract?	Upside only or upside and downside risk?	Max shared savings rate, if applicable	Max shared loss rate, if applicable	Cap on savings payments, as PMPM or % of budget, if applicable	Cap on shared loss amounts, as PMPM or % of budget, if applicable	Payment methodolog	Description of quality incentives in the payment y model
						FFS payments	Quality score affects spending benchmark (higher
	Upside and					reconciled again	st performance reduces standard benchmark
Partial risk	downside risk	75%	75%	10% <u>or</u> \$20 PMPM	10% <u>or</u> \$20 PMPM	budget	discount)
Full risk	Full risk Upside only			Prospective capi	tation		
						Partial prospect	ve
						capitation (e.g.)	for
						primary care)	



Assessment Criteria

Patient-centered, accountable governance structure

- Meaningful participation of ACO participants
- 2 Patient/consumer representation and Patient and Family Advisory Committee (PFAC)
 - Responsibility for assessment and improvement of the quality of and access to care

Population health management programs



Risk stratification and program implementation

Cross-continuum care: coordination with BH, hospital, specialist, and LTSS services



Effectiveness of collaborations, coordination, and tracking



AC #1 – Governance Structure

Domain	Criterion	Documentation requirements
Patient-centered, accountable governance structure	The ACO has an identifiable and unique Governing Body with authority to execute the functions of the ACO. The ACO provides for meaningful participation in the composition and control of the Governing Body for its participants or their representatives.	 Excerpts of Governing Body by-laws or other authoritative documents that demonstrate the Governing Body's authority to execute the functions of the ACO. Organizational chart(s) of the Governance Structure(s), including Governing Body, executive committees, and executive management. Governance Structure key personnel template, including the following identifying information for Governing Body members, executive committee members, and executive management staff: name; title and clinical degree/specialty; role within the Governance Structure Attestation that ACO Participants have at least 75% control of the Governing Body



AC #2 – Patient / Consumer Representation

Domain	Criterion	Documentation requirements
Patient-centered, accountable governance structure	The ACO governance structure is designed to serve the needs of its patient population, including by having at least one patient or consumer advocate within the governance structure and having a patient and family advisory committee.	 Identify the patient(s) or consumer advocate(s) on the organizational chart(s) and template submitted for AC #1. Description of at least one patient and family advisory committee (PFAC) or other group that is composed of patients, families, and/or consumer advocates. If the Applicant intends to use an existing hospital-based Patient and Family Advisory Council (PFAC) to satisfy this requirement, excerpted meeting minutes of most recent PFAC meeting where issues pertaining to the ACO(s) were discussed. Publicly available narrative demonstrating one or more ways the Governance Structure(s) seeks to be responsive to the needs of its patient population.



AC #3 – Performance Improvement Activities

evidence-based guidelines.

Domain	Criterion	Documentation requirements
Patient-centered, accountable governance structure	The ACO Governing Body regularly assesses the access to and quality of care provided by the ACO, in measure domains of access, efficiency, process, outcomes, patient safety, and patient experiences of care, for the ACO overall and for key subpopulations (i.e. medically or socially high needs individuals, vulnerable populations), including measuring any racial or ethnic disparities in care. The ACO has clear mechanisms for implementing strategies to improve its performance and supporting provider adherence to	Narrative of how the Governing Body(ies) assesses performance and sets strategic performance improvement goals, no less frequently than annually. Performance dashboard(s) with measure name detail and a description of how often the Governing Body(ies) reviews the dashboard and related strategic goals (at least annually). The dashboard must include at least one measure in each domain (process, efficiency, outcomes, and patient experience) and indicate which measures are stratified by sub-population and by which sub-populations. At least one measure must be stratified by a sub- population.



AC #4 – Population Health Management Programs

Domain	Criterion	Documentation requirements
Population health management programs	The ACO routinely stratifies its entire patient population and uses the results to implement programs targeted at improving health outcomes for its highest need patients. At least one program addresses behavioral health and at least one program addresses social determinants of health to reduce health disparities within the ACO population.	Description of the Applicant's approach to stratifying its patient population including: frequency (at least annually), factors on which stratification is completed, data sources and methodology, and any differences among subpopulations. Description of at least one program operated by the Applicant that addresses BH and at least one program that addresses SDH including: patient targeting, specific intervention and staffing model, target performance metrics, size of program, and linkages to community resources or organizations.



AC #5 – Cross-continuum Care

Domain	Criterion	Documentation requirements
Cross continuum care	To coordinate care and services across the care continuum, the ACO collaborates with providers outside the ACO as necessary, including: • Hospitals • Specialists • Specialists • Deng-term services/supports • Behavioral health providers	Lists of providers included in the ACO or with whom the ACO has written agreements (hospitals, specialist, long- term services and supports, and behavioral health). Applicants with written collaborative agreements with these entities must provide information on which factors are considered when entering into arrangements. Applicants without such agreements must provide a description of other arrangements or plans to enter into written agreements.



Supplemental information



 Providing a basis for a return benefit to ACOs in the form of HPC-convened learning opportunities (topical discussions, webinars, publications, etc.)



SI #1 – Distribution of shared savings and performance-based compensation

Focus	Question	Response format/fields
Distribution of shared savings and performance- based compensation	Does the ACO distribute shared savings or losses under risk-based contracts? Do ACO Participants use performance-based provider compensation models? How are quality, cost, and patient experience data considered?	 Does the Applicant and/or its Component ACOs distribute shared savings or losses under risk-based contracts among participating providers? No distribution of shared savings or losses Distribution, but not based on performance (e.g., based on panel size or other volume metrics) - <i>describe</i> Distribution based on performance If distribution is based on performance, which of the following best describes the level at which performance is considered? Individual clinicians - Practice PO, PHO, IPA - Other risk unit Which of the following best describes Applicant's and/or its Component ACOs' approach to requiring or incentivizing ACO Participants to use performance-based compensation models for participating providers? No requirement or incentives Requirement to use performance-based models Other incentives to use performance-based models – <i>describe</i>



SI #1 – Distribution of shared savings and performance-based compensation (cont.)

Focus	Question	Response format/fields
Distribution of shared savings and performance-based compensation	Does the ACO distribute shared savings or losses under risk-based contracts? Do ACO Participants use performance-based provider compensation models? How are quality, cost, and patient experience data considered?	 Which of the following factors, if any, does the Applicant and/or its Component ACOs consider in developing performance-based shared savings/losses distribution approaches or in requiring/incentivizing ACO Participants to use performance-based compensation models? Quality Absolute or relative cost Cost trend Efficiency Patient experience data Structural or process factors Citizenship Other – describe None of the above Please explain the Applicant's and/or its Component ACOs' approach to savings/losses distribution and/or performance-based compensation, including a description of how each of the factors checked above is considered For providers employed by the Applicant, its Component ACOs, and/or other corporately affiliated entities that participate in the ACO, approximately what percentage of total provider compensation is performance-based? None Greater than 0% and less than 5% 5% or greater and less than 10% 10% or greater and less than 20% 20% or greater N/A – no employed providers

SI #2 – High-value care

Focus	Question	Response format/fields
High-value care	How does the ACO promote use of high-value care and services, encourage appropriate prescribing, and facilitate appropriate care transitions?	 Has the Applicant and/or its Component ACOs developed strategies to address unnecessary utilization in any areas of low-value care: Screenings Procedures Imaging Prescribing Other - describe None of the above For each area selected, briefly describe the strategy used and whether strategies differ by Component ACO. What strategies, if any, has the Applicant and/or its Component ACOs implemented to facilitate appropriate care transitions and/or manage post-acute care utilization and spending? Facilitating information sharing across settings Developing a preferred network of post-acute providers Dedicated staff Mobile patient monitoring Joint care protocols between acute and post-acute providers Other - describe None of the above



SI #3 – Advanced primary care and behavioral health integration

Focus	Question	Response format/fields
Advanced primary care and behavioral health integration	Does the ACO have a strategy to increase and provide support for access to advanced primary care and integrated behavioral health care? If so, what do those strategies include?	 Which of the following best describes the Applicant's and/or its Component ACOs' approach to [supporting the development and maintenance of advanced primary care capabilities among its ACO Participant primary care providers / increasing and sustaining access to integrated behavioral health care in primary care settings]? The ACO has a strategy The health system of which the ACO is a part has a strategy ACO primary care providers may pursue, but no specific ACO or system strategy If the ACO or health system has a strategy, select which of the types of support below are included, and provide a brief written description Financial Infrastructure Technical Assistance Other - describe



SI #3 – Advanced primary care and behavioral health integration (cont.)

Focus	Question	Response format/fields
Advanced primary care and behavioral health integration	Does the ACO have a strategy to increase and provide support for access to advanced primary care and integrated behavioral health care? If so, what do those strategies include?	 Considering the SAMHSA-AHRQ Six Levels of Integration framework, fill in the approximate percent of ACO Participant primary care practices that correspond to each level. Briefly describe how you determined or estimated these percentages (e.g., data based on practice surveys, direct inquiries, or another methodology). Does the Applicant and/or its Component ACOs provide support to any participating behavioral health providers to employ a "reverse integration" model of incorporating primary care into behavioral health care settings? (Y/N) If Yes, provide a brief written description Does the ACO currently offer a common solution, or have specific plans to implement a solution or supports, for participating providers to provide access to behavioral health services via telemedicine? (Y/N)
Adv		- If Yes, provide a brief written description

Confidentiality for ACO Certification Materials

Nonpublic clinical, financial, strategic, or operational documents or information submitted to the HPC in connection with ACO certification have confidentiality protections pursuant to M.G.L. c. 6, § 2A. The HPC may make the information public in de-identified summary form, or when the HPC believes that disclosure is in the public interest.

Information for Public Reporting

Background Information

- Applicant name, contact info
- Component ACO(s) name, contact info
- Name(s) of payer(s) with which Applicant and Component ACOs have quality-based risk contract(s); year that each contract began and expires; whether the contract is upside-only or two-sided; and number of attributed patients per contract

<u>AC-1</u>

 Org chart(s) and position of patient/consumer rep within the governance structure;

<u>AC-2</u>

- Description of patient and family advisory committee(s);
- Public narrative demonstrating ways the governance structure seeks to be responsive to patient population needs.

Information for Public Reporting If the Applicant Consents

Portions and/or summaries of responses to all other questions





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2019 HPC ACO Certification Application Process Timeline

June

- Early June: Share final PUG w/ ACOs
- Late June: Criteria training webinar

July

Mid July: weekly office hours begin

August

- OnBase application platform complete
- Application platform training sessions

September

Open application platform

October

- October 1: applications due
- HPC review process begins completeness check

November

• HPC review process continues, outreach to ACOs for revisions, etc.

December

 Mid to late December: Announce/notify ACOs of certification decisions



ACO Certification Application Platform

- Applicants submit ACO Certification applications via a secure, web-based platform
- Provides for communication between applicants and the HPC (e.g., content questions, technical issues, certification decision)





Preview of ACO Certification Application Platform – Account Creation



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Preview of ACO Certification Application Platform – Home Screen

k		chusett Comm							
Intent to Apply	ACO Application Access	2017 Documents	Super User I	Portal Settings	User Settings	Contact Us	Logout		
Form Completion		TYPE			ORGANIZATION NAM	E		YEAR	STATUS
Items: 0	Tabs for ITA, A to 2017 A	pplication pplication		ess		No Results			
Awaiting HPC Revi	iow								
FORM NUMBER		TYPE			ORGANIZATION NAM	Ε		YEAR	STATUS
						No Results			
Items: 0									
Reviewed By HPC									
FORM NUMBER		TYPE			ORGANIZATION NAM	E		YEAR	STATUS

ACO Name



Form

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Preview of ACO Certification Application Platform – Intent to Apply Form

Intent To Apply Form

H P	PLEASE NOTE: The health care provider or provider organization	w to begin the application process. After submitting this form, the Primary Application C n applying for certification (the Applicant) must have common ownership of control of an Please see the 2019 ACO Certification Application Requirements and Platform User Gui	y and all corporately affiliated cor	
APPLICANT ORGANIZATION INFO	APPLICANT ORGANIZATION PUBLIC CONTACT INFO	PRIMARY APPLICATION CONTACT INFO	COMPONENT ORGANIZATION	
Organization Name ACO ID	NOTE: The applicant contact information supplied below will be publicaly listed on HPC's website as the primary contact for ACO-related matters.	NOTE: The primary application contact is an application portal user and the person designated to be the HPC's primary contact for purposes of ACO certification.	Organization ACO	
Organization Address	Applicant Public Contact Prefix	Primary Application Contact Prefix	1	
Organization Address	MR	Mr		
Organization State	Applicant Public Contact First Name	Primary Application Contact First Name		
MA	Muffin	Muffin		
Organization City	Applicant Public Contact Last Name	Primary Application Contact Last Name		
e generation only	Man	Man		
Organization City Organization Zip	Applicant Public Contact Title	Primary Application Contact Title		
Organization City Organization Zip 11111 Tax Identification Number (TIN) 999		Primary Application Contact Title Primary Application Contact Phone Number	<i>z</i>	



Preview of ACO Certification Application Platform - Application

Save Sav	ave and Close Save and New	Delete	Copy Object	SRefresh	History	Documents	Forms	Discussion	Print	∽ More	Toggle Tasks	
lain Asse	essment Criteria Back	ground Inform	mation Supp	plemental Info	ormation	Affidavit of Tr	ruthfullness					
plication Fo	orm				Ta	bs for a sec	applica tions	ation				
SSESSMENT	CRITERIA DOMAIN											
	ance Structure		d total at			(4) 100	71					
e ACO has a	an identifiable and unique	Governing B	ody with author	rity to execute	the functio	ns of the ACO.	. The ACO pr	ovides for mea	iningful partici	pation in the co	mposition and conti	rol of the Governing Body for its participants or
cumentation	n Requirements											
	s of Governing Body by is Component ACOs wit											HPC ACO Bylaws
	Attestat											🖺 No documents found
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	hat the Applicant's respor n, and (2) provides a con								s fully accurate	and applicable	as of the date of th	is 2019
	ational chart(s) of the G Applicant has Compone											after HPC ACO Org Chart
0-2. II the A	applicant has compone	ant ACOS WIL	n unique Gove	emance Struc	ctures, the	Аррисант ти	ist provide a	i separate org	anizational c	nart for each t		No documents found
												UPLOAD HPC ACO Org Chart
	hat the Applicant's respor on, and (2) provides a con								fully accurate	and applicable	as of the date of th	is 2019
. Governa	ance Structure key perse	onnel templa	ate (use temp	late provideo	d), including	g the followin	ıg identifyin	g information	for Governing	g Body membe	ers, executive	Document uploads



Preview of ACO Certification Application Platform – Accessing 2017 Application Documents

Massachusetts Health Policy Commission (HPC)									
Intent to Apply	ACO Application	Access 2017 Documents	Super User	Portal Settings	User Settings	Contact Us	Logout		
ccess 2017 Docu	ments								
ACO APPLICATION #	ORGANIZATION	IAME DOCUMENT TYPE		1					
99	ACO Name	Contraction of the second seco	rning Body By-Law	5					
99			ming Body By-Law						
99		HPC - AC-1 Gover	rning Body By-Law	5					
100		HPC - AC-1 Gove	rning Body By-Law	s					
113		HPC - AC-1 Gover	rning Body By-Law	s					
111		HPC - AC-1 Gove	rning Body By-Law	5					
108		HPC - AC-1 Gover	ming Body By-Law	s					
119		HPC - AC-1 Gove	rning Body By-Law	s					
98		HPC - AC-1 Gover	ming Body By-Law	. .					



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Email questions to <u>HPC-Certification@mass.gov</u>

Visit the HPC's ACO Certification Website for up-to-date information: <u>https://www.mass.gov/service-details/the-hpc-accountable-care-organization-aco-certification-program</u>

Join us for weekly office hours calls beginning July 18.

