

# Provider Price Variation Stakeholder Discussion Series

May 19, 2016



#### **AGENDA**

- HPC Staff Presentation: Direct limits on price variation
- Presentation by Dr. Joshua Sharfstein, Former Secretary of Maryland Department of Health and Mental Hygiene and Current Professor and Associate Dean of the Johns Hopkins University Bloomberg School of Public Health
- Stakeholder Discussion
- Next steps

#### Recap: Key findings from HPC examination of provider price variation

- Provider prices vary extensively for the same sets of services.
- Provider price variation has not diminished over time.
- Market leverage continues to be a significant driver of higher prices; higher hospital prices are not generally associated with higher quality or other value-based factors that provide benefit to the Commonwealth.
- While some variation in prices may be warranted to support activities that provide value to the Commonwealth (e.g. physician training), unwarranted variation in prices combined with the large share of volume at higher-priced providers results in increased health care spending and creates inequities in the distribution of health care resources.
- Other states have also found unwarranted variation in provider prices; however, in one state that limits hospital price variation to value-based factors, hospital prices for specific services vary less than in Massachusetts.
- Unwarranted price variation is unlikely to diminish over time absent policy action to address the issue.



#### Recap: Provider price variation stakeholder discussions

Following the 2015 Cost Trends Report on Provider Price Variation, the HPC has provided additional research and analyses and convened stakeholders to present and discuss specific policy options to reduce unwarranted price variation, including:

March

Policies to enhance healthcare market transparency and encourage consumers to use high-value providers for their care;

**April** 

Transitioning away from use of historic spending for setting global budgets; and

**Today** 

Options to directly limit price variation

A more sustainable and value-based health care system



#### **Direct limits on price variation: Overview**

- Policies that directly limit price variation are potentially a more direct, faster and more targeted approach to addressing unwarranted price variation
- There are both different direct limit policy options to consider, e.g.:
  - Rate "banding," or prohibiting prices from varying from average by more than a given amount;
  - Creating differential growth rates where lower-priced or more efficient providers are allowed greater increases in prices and/or global budgets than higherpriced or less efficient providers;
  - Limiting price variation (FFS or global budgets) to value-based factors that provide benefit to the Commonwealth;
  - And other options, including those used in payment systems (e.g. Maryland, Medicare)
- ...and different ways to implement those policies, e.g.:
  - Implementation over time versus at one point in time
  - Implementation of one versus a combination of multiple policies
  - Differing degrees of government oversight, e.g. full rate-setting versus retaining private negotiations within certain guardrails



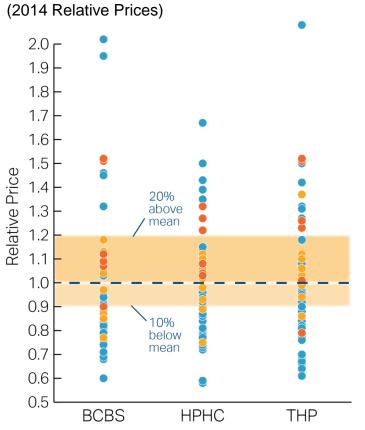
#### Considerations and challenges for direct limit policies

- Different policies and implementation options will differ in the extent to which they can achieve certain outcomes, e.g.:
  - Controlling total health care spending over time, in addition to price variation
  - Creating a more value-driven health care marketplace
  - Promoting the financial health of low-cost providers
  - Complementing demand-side and supply-side incentives, including by applying to both fee-for-service rates and global budgets
  - Aligning incentives across the provider market, including for lower-priced providers
  - Applying across health care market, e.g. to hospitals, primary care and specialist physicians, insurance markets
- ...and the challenges they may create:
  - Resources necessary for greater government oversight
  - Technical complexity of defining appropriate target levels of variation, timing for rate convergence, and/or adjustment levels for appropriate variation
  - Potential for unintended consequences for providers, payers, and/or consumers



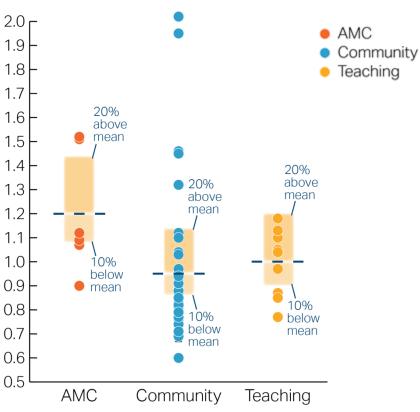
#### **Direct limit policy options: Rate banding**

#### **Example of Rate Banding: All Hospitals**



#### **Example of Rate Banding: By Cohort**

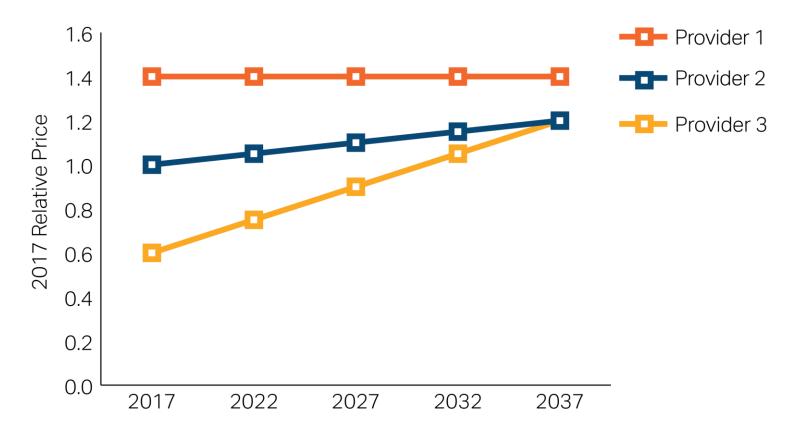






#### **Direct limit policy options: Differential growth rates**

Example of Differential Price Growth: No Growth for Highest-Priced Provider

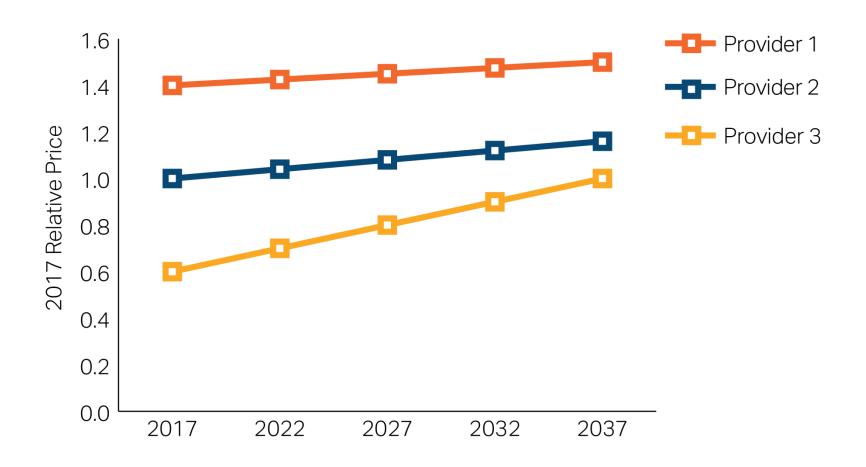


Convergence may take time. As noted in the Cost Trends Report on Provider Price Variation, due to the extent of the price variation in the market for the same sets of services, it would take **19 years** for some hospitals to reach the prices of the 75<sup>th</sup> percentile in 2013, even if they received 3.6% annual price increases.



#### **Direct limit policy options: Differential growth rates**

Example of Differential Price Growth: Slow Growth for Highest-Priced Provider





# Limiting variation to acceptable factors; examples of "acceptable factors" from other payment systems

|   | Clinical<br>Complexity | Geography              | Teaching                  | Patient/<br>Payer mix                            | High-Cost<br>Outliers | Other   |
|---|------------------------|------------------------|---------------------------|--|-----------------------|---|
| Medicare<br>(IPPS)                              | Yes<br>(DRG<br>weight) | Yes<br>(wage<br>index) | Yes (direct and indirect) | Yes (DSH adjustment)                             | Yes                   | Payments for certain rural or low-volume hospitals; bad debts, etc.                         |
| MassHealth<br>(inpatient)                       | Yes<br>(DRG<br>weight) | Yes<br>(wage<br>index) | No                        | Yes (e.g.,<br>DSH<br>adjustment)                 | Yes                   | Pass-throughs (e.g., organ acquisition); readmission adjustments; Critical Access Hospitals |
| Maryland<br>(inpatient &<br>outpatient)         | Yes                    | Yes<br>(wage<br>index) | Yes (direct and indirect) | Yes (Uncompensated care and DSH-type adjustment) | Yes                   | Certain highly<br>specialized services<br>excluded, special<br>readmission rules            |
| OECD<br>generally<br>(*DRG-based,<br>inpatient) | Yes                    | Yes                    | Yes                       |  | Yes                   | E.g., research, innovation, high-cost services  |



## Limiting variation to acceptable factors; examples of adjustment amounts for acceptable factors from Medicare

- While the range of variation permitted for these factors varies, for many factors the range of adjustments in Medicare is relatively narrow. For others, only a few providers qualify for the additional payment.
- Medicare payment ranges for acute inpatient hospitals (FY 2016):
  - Geography: Current wage index differentiation\* in MA is narrow (3%)
  - Teaching status (based on ratio of residents per bed): maximum adjustment in MA was a 40% increase to operational DRG rates
     (30 hospitals; median 14% increase; 10th to 90th percentile range 1% to 36%)
  - Disproportionate share of low-income patients \*\* (DSH): maximum adjustment in MA was 11% increase to operational DRG rates
     (47 hospitals; median 3% increase; 10th to 90th percentile range 1% to 7%)
  - Few hospitals qualify for additional rate adjustments (e.g. based on rural status)

<sup>\*</sup>Differences in payment due to geographic variation were narrowed (with lower end raised) in 2011 by the reclassification of the rural Nantucket Cottage Hospital from a critical access hospital to a hospital paid under the regular inpatient hospital payment system.

**<sup>♦</sup>**HPC

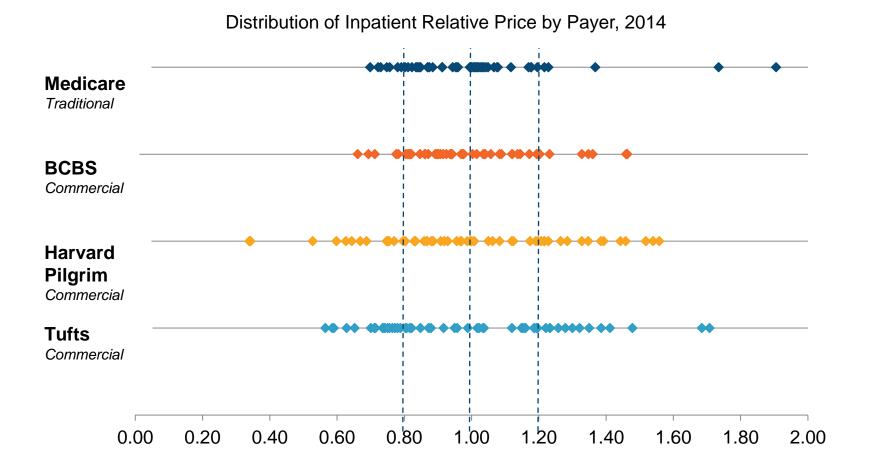
<sup>\*\*</sup> A hospital's low-income share is the sum of the proportion of its Medicare inpatient days provided to patients eligible for Supplemental Security Income benefits and the proportion of its total acute inpatient days furnished to Medicaid patients. In addition, under PPACA, hospitals will receive a share of a fixed pool of dollars representing the "uncompensated care pool." (MedPAC Payment Basics, IPPS 2016)

## Limiting variation to acceptable factors; examples of adjustment amounts for acceptable factors from Medicare

- Medicare payment ranges for physician services (CY 2016):
  - In Massachusetts, Medicare only pays differently for "practice expenses" (e.g. office space, administrative staff) for two different regions, paying only 9 percent more for practice expenses in Metro Boston compared with the rest of the Commonwealth.
  - For example, for a 15 minute evaluation & management visit\*, Medicare pays \$79 in metro Boston vs. \$75 in the rest of the Commonwealth in 2016.
  - In comparison, in 2013, BCBS paid \$139 at the 90<sup>th</sup> percentile and \$66 at the 10<sup>th</sup> percentile for a 15 minute evaluation & management visit.

# Limiting variation to acceptable factors; extent of price variation under Medicare's administered pricing

As a result, **Medicare prices do vary**, but the variation is based on certain factors that are defined by that system as acceptable, and prices are similar for most providers

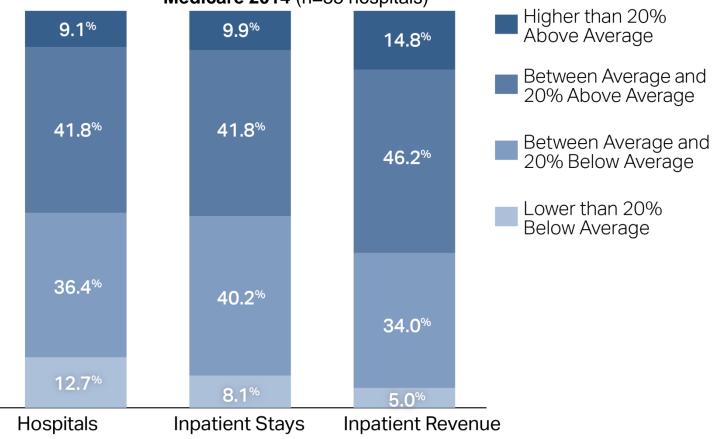




# Limiting variation to acceptable factors; concentration of stays and revenue by Medicare price level

- In Medicare, more than three-quarters of providers receive prices that are within 20% of average, and volume and revenue are not concentrated among the highest priced providers.
- The highest priced **50%** of hospitals account for **51.7%** of volume and **61%** of revenue.

Distribution of Hospitals, Inpatient Stays, and Revenue by Inpatient Relative Price: Medicare 2014 (n=55 hospitals)

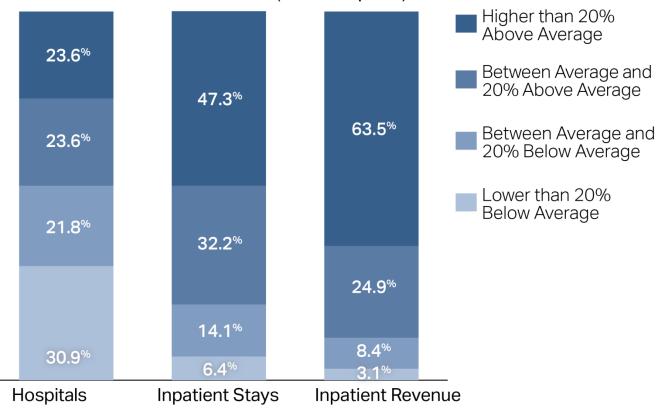




# Limiting variation to acceptable factors; concentration of stays and revenue by commercial price level

- In contrast, in the commercial market where prices may vary based on market factors, prices are more variable, and volume and revenue tends to be at the highest priced providers.
- For Tufts Health Plan, fewer than half of providers receive prices within 20% of average, and the highest priced 47.2% of hospitals account for 79.5% of volume and 88.4% of revenue.

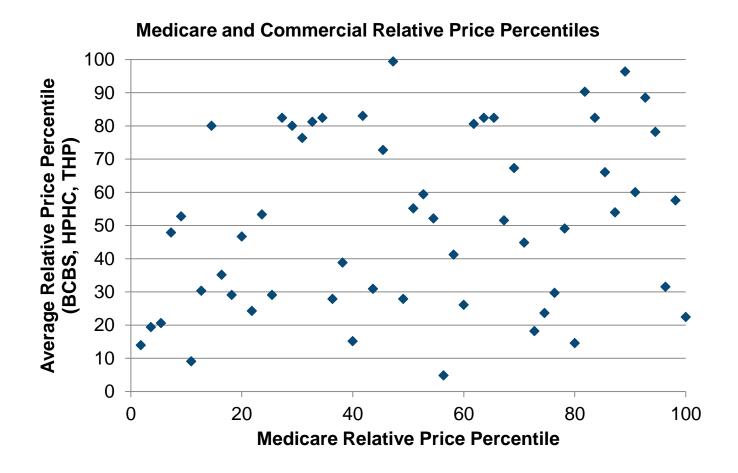
## Distribution of Hospitals, Inpatient Stays, and Revenue by Inpatient Relative Price: THP 2014 (n=55 hospitals)





## Limiting variation to acceptable factors; Medicare and commercial prices have little correlation

In Medicare, where prices are allowed to vary based on certain acceptable factors, the price levels of different providers also have little relationship with commercial price levels.





#### Limiting variation to acceptable factors; current Massachusetts market

A quick recap: In Massachusetts, a substantial portion of hospital price variation is associated with market structure, and not with quality

## Factors associated with <u>higher</u> commercial prices

(Holding all other factors equal)

Less competition

Larger system size (above a certain size)

Corporate affiliations with certain systems

Provision of higher-intensity (tertiary) services

Status as a teaching hospital

# Factors associated with <u>lower</u> commercial prices

(Holding all other factors equal)

More Medicare patients

More Medicaid patients

Corporate affiliations with certain systems

# Factors not generally associated with commercial prices

(Holding all other factors equal)

Quality

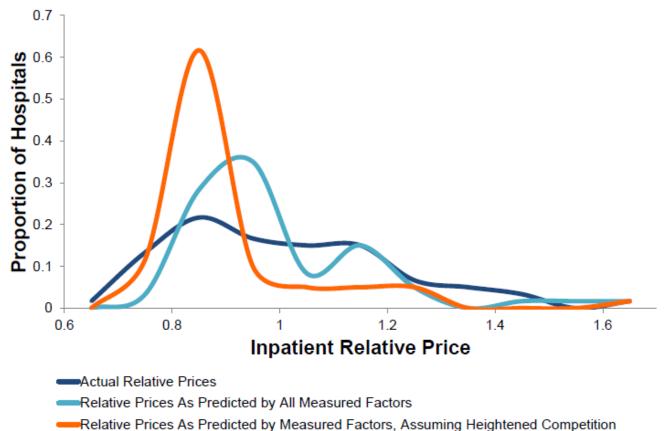
Mean income in the hospital's service area



## Limiting variation to acceptable factors; holding certain competition factors constant reduces variation

Holding certain competitive factors constant at levels that indicate increased competition among hospitals results in reduced price variation (orange line).

## Distribution of Inpatient Relative Prices Blue Cross Blue Shield





#### Other direct limit policy options: Examples from other states



#### Rhode Island

- Office of the Health Insurance Commissioner (OHIC) conducts annual insurance rate review. The standards for the review include Affordability Standards.
- The Affordability Standards include Hospital Contracting Conditions:
  - The average annual percent increase in inpatient and outpatient price may not exceed the increase in the national Consumer Price Index for Urban Consumers, plus 1%.
  - All hospital contracts must have a quality incentive program, and at least 50% of annual price increases must be earned through quality performance.

#### **West Virginia**

- Health Care Authority (HCA) sets maximum hospital charges for commercial payers.
- Hospitals and commercial payers negotiate prices within a corridor with a floor of the hospital's costs and a ceiling of the HCA-set charge limit.



All-payer rate-setting system



## Other direct limit policy options: Maryland's approach to hospital pricing before 2014

- Maryland's pricing system was built on unit prices for individual services. Prices were set based on historical hospital costs plus a mark-up, and adjusted where costs were excessive relative to peers, after accounting for the same factors noted below.
- Utilization of individual services was constrained by per-case charge limits, case-mix-adjusted using APR-DRGs (inpatient) and ambulatory patient groups (outpatient). For most of the period from 1977 to 2014, an additional volume adjustment was applied to prices for volume exceeding defined levels.
- Unit prices and per-case limits were adjusted annually for inflation and to adequately account for input cost increases, new technology, and productivity improvement.
- There was also an annual screening for the reasonableness of hospital charge-percase. Hospitals were compared to peers (based on AMC status, geography, and size) with adjustments made to hospital charges for:
  - Uncompensated care
  - Direct Medical Education, Nurse Medical Education, and trauma
  - Indirect Medical Education
  - Disproportionate share of low income and elderly patients
  - Case Mix
  - Labor market adjustment
  - Capital costs (partially recognized)
- After those adjustments, hospitals found to have excessive charges\* reduced them over time through lower unit prices.



## Other direct limit policy options: Maryland's approach to hospital pricing before 2014

- This system yielded financial stability across the hospital sector and a narrower distribution of earnings at the individual hospital level.
  - The span between the tenth and ninetieth percentiles of total (all-payer) margins, for example, was 8.2 percent in Maryland, compared to 21.1 percent nationally in 2003.\*
  - Maryland has also had the highest proportion of hospitals rated "investment grade" of any state.\*\*
- From 2010 to 2015, the state's flagship AMC, Johns Hopkins Hospital, has consistently had operating margins above 3%. Other metrics further indicate a consistently strong financial position.\*\*\*
- Maryland's new global revenue system was designed to build on the previous system to encourage hospitals to care for a patient population while reducing potentially avoidable utilization.

<sup>\*\*</sup>Id. citing Moody's Investor Services; 2006. Maryland had 72 percent of its hospitals rated "investment grade" (33 of 46 nonprofit hospitals) compared with 19 percent rated "investment grade" nationally (560 of 2,919 nonprofit hospitals).



<sup>\*</sup>Robert Murray, Setting Hospital Rates to Control Costs and Boost Quality: The Maryland Experience, Health Affairs (2009) citing a MedPAC analysis of 2003 Medicare Hospital Cost Reports.



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## Global Budgeting: Good for What Ails MA?

Presentation to the Massachusetts Health Policy Commission

Joshua M. Sharfstein, M.D. May 19, 2016



JOHNS HOPKINS
BLOOMBERG SCHOOL
OF PUBLIC HEALTH

MILLIONS AT A TIME

# **Starting Questions**

- How do we create a system that supports a healthier population, appropriately rewards high-quality and efficient providers, and also reduces health care spending over time?
- How do we ensure that different parts of the health care system are included (e.g. physicians, specialty providers, and populations beyond those in the small group and/or fully-insured markets)?
- How can we accomplish a significant change in the health care payment system while supporting opportunities for health care providers to innovate and make decisions that affect their future?



## Plan

- Background on Maryland's all-payer rate setting system
- Explanation of Maryland's new model for global budgets for hospitals
- Maryland and Price Variation
- Answers to 3 Questions

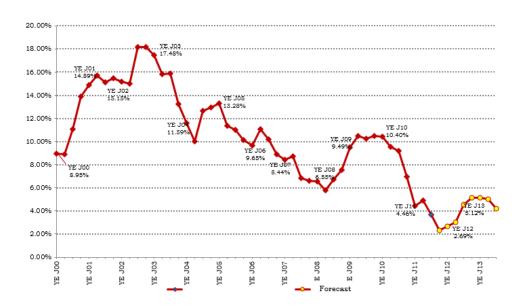


- Since the late 1970s, the Maryland's quasi-public Health Services Cost Review Commission sets inpatient and outpatient hospital rates for all public and private payers.
- Rates set based on factors that include case mix, reasonable hospital costs, wage variations, graduate medical education, quality incentives, level of uncompensated care.
- Essentially, each hospital gets its own rate card and all payers pay off the rate card.
- In the last 35 years, Maryland's rate-setting system:
  - Eliminated cost-shifting among payers
  - Allocated cost of uncompensated care and medical education among all payers
  - Allowed usage of creative of incentives to improve quality and outcomes



## **Conditions for Medicare Participation**

- All-payer system
- Rate of growth of prices slower than national rate of growth of prices in Medicare program

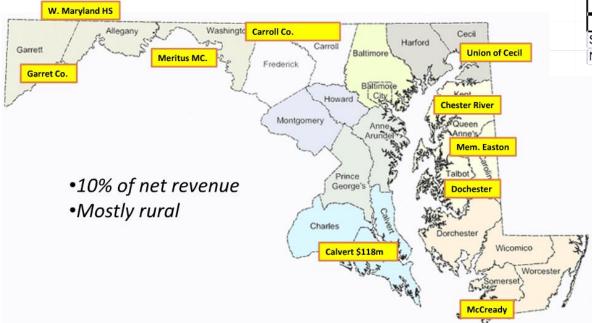




## A Pilot: Total Patient Revenue, Meaning a Global Budget Across All Payers

\*Strong Incentive for Clinical Transformation\*

## **TPR Hospitals**



## TPR versus non-TPR Hospitals: Before and After TPR Implementation in 2011

|                            | TPR      | Non-TPR |  |  |  |  |
|----------------------------|----------|---------|--|--|--|--|
| Inpatient Admissions       |          |         |  |  |  |  |
| FY2010                     | 91,672   | 668,319 |  |  |  |  |
| FY2013                     | 75,478   | 608,166 |  |  |  |  |
| %Change                    | -17.7%   | -9.0%   |  |  |  |  |
| Same Hospital Readmissions |          |         |  |  |  |  |
| FY2010                     | 9,530    | 64,842  |  |  |  |  |
| FY2012                     | 7,729    | 58,269  |  |  |  |  |
| %Change                    | -18.9%   | -10.1%  |  |  |  |  |
| Avoidable Admissions       | s(PQI90) |         |  |  |  |  |
| CY2010                     | 11,551   | 65,517  |  |  |  |  |
| CY2012                     | 9,593    | 57,148  |  |  |  |  |
| %Change                    | -17.0%   | -12.8%  |  |  |  |  |
| Source: HOODE May 2        | 012      |         |  |  |  |  |

Source: HSCRC, May 2013.

Note: FY2013 is based on 6 month data and annualized.













## Concept: Move All Hospitals to Global Budgets

- Former Hospital Payment Model:
  - Volume Driven

**Units/Cases** 

Rate Per Unit or Case (Updated for Trend and Value)



**Hospital Revenue** 

- Unknown at the beginning of year
- More units creates more revenue

- New Hospital Payment Model:
  - Population Driven

**Revenue Base Year** 





Allowed
Revenue for Target Year

- Known at the beginning of year
- More units does not create more revenue

Source: HSCRC

# January 1, 2014: A New Model for Hospital Payment in Maryland

- Transition away from fee-for-service hospital payment over 5 years
- Global budget cap for all payers tied to Gross State Product per capita (3.59% annual growth rate)
- Guaranteed savings to Medicare (\$330 million over 5 years)
- Strong requirements for quality and patient experience improvements



## Maryland's Hospital Model



#### Perspective

#### Maryland's All-Payer Approach to Delivery-System Reform

Rahul Rajkumar, M.D., J.D., Ankit Patel, J.D., Karen Murphy, Ph.D., John M. Colmers, M.P.H., Jonathan D. Blum, M.P.P., Patrick H. Conway, M.D., and Joshua M. Sharfstein, M.D.

> n January 10, 2014, the Centers for Medicare and Medicaid Services (CMS) and the State of Maryland jointly announced the launch of a statewide model that will transform Maryland's health

some aspects of the new approach admission. may be unique to Maryland and all-payer approach.

care delivery system. Although in Medicare payment per hospital possible by the authority granted

has operated what is now the both the incentives created by outcomes. country's only all-payer rate-set- Maryland's current Medicare waivting system for hospital services. er and changes in the delivery Maryland will limit the growth An independent commission sets system have created unnecessary of per capita hospital costs for a rate structure for each hospital. pressure to increase the volume all payers, including the growth All payers, public and private, pay of hospital services provided. This of costs of both inpatient and outfor services according to these pressure, combined with the fact patient care, to 3.58%, the 10-year rates. Medicare's participation is that Medicare pays higher rates compound annual growth rate of authorized by the Social Security for hospital services in Maryland the per capita gross state prod-Act and is tied to a growth limit than it does under the national uct. Maryland will also limit the

inpatient and outpatient care, has resulted in per capita Medicare hospital costs in Maryland that are among the country's highest. The new model, which is made

prospective payment systems for

to the Center for Medicare and This system has eliminated Medicaid Innovation under the not applicable elsewhere, both the cost shifting among payers, more Affordable Care Act, will change principles of this model and the equitably spread the costs of un- the basis for Medicare's participaprocess that led to its development compensated care and medical tion in Maryland's system. In place may serve as a guide for future education, and limited the growth of the limit on per-admission federal-state partnership efforts of per-admission costs. The sys- payment, the new model focuses aiming to improve health care tem's historical performance in on overall per capita expenditures and to lower costs through an containing payments per admis- for hospital services, as well as sion for all payers has been no- on improvements in the quality Since the late 1970s, Maryland table.1 However, in recent years, of care and population health

For 5 years beginning in 2014,

"The boldest proposal in the United States in the last half century to grab the problem of cost growth by the horns."

 Professor Uwe Reinhardt, **Princeton University** 



Maryland's original goal was to move, by the end of year 5, 80% of all hospital payment for state residents to global budgets.

By the end of the first six months, Maryland achieved 95%.



### Approach to Moving to a More Patient-Centered System

# Improving Patient-Centered Care

Chronic Care & Care for Patients with High Needs

Collaboration & Coordination Across Providers/Others

Utilization of Patient-Centered Measures

### Reducing Avoidable Utilization

Maryland's Hospital Acquired Conditions

PQIs: Prevention Quality Indicators

Readmissions and Rehospitalizations

# Ensuring Consumer Protections

Global Budget Contracts

Market Shift, Transfers, Transplants/Other

Data Analytics:
Detailed Monthly
Reports on Volumes



# **Examples**

#### **Meritus Health**



#### **School Health Program**

At Meritus Health, we believe that all children are entitled to quality healthcare services and that good health helps support academic achievement. The Meritus Health School Health program serves the 22,000 students of Washington County Public School system in 27 elementary schools, eight middle schools and eight high schools. On average, our healthcare providers see 500 to 700 students each month in school health rooms.



Sinai Hospital and HealthCare Access Maryland Pioneer a New Program to Link Emergency

Department Patients with Needed Services

Baltimore, MD – <u>Sinai Hospital</u> of Baltimore and <u>HealthCare Access Maryland</u> are piloting a groundbreaking program developed to proactively help patients, who frequently use the hospital's Emergency Department for non-urgent and chronic health conditions, better manage their own care, lead healthier lives, and in turn, save precious health-related resources.





### Maryland Performance in Year 1 (CY 2014)

## Performance Measures

Hospital Revenue to Global or Population-based

All-Payer Revenue Growth

Medicare Savings in Hospital Expenditures

Medicare Savings in Total Cost of Care

All-Payer Quality Improvement Reductions in Hospital Acquired Conditions

Readmissions Reductions for Medicare

### **Targets**

≥ 80% by Year 5

≤ 3.58% per capita

≥ \$330m over 5 years

Lower than the national average

30% reduction over 5 years

≤ National average over 5 years

## CY 2014 Results

> 95% in Year 1

1.47% per capita

\$116 in Year 1

1.5% lower than national average

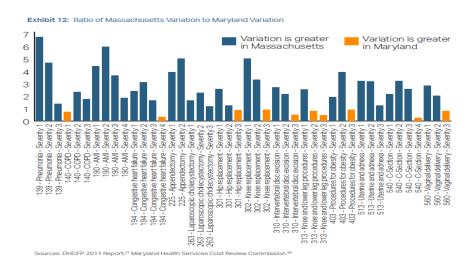
26% reduction in
Year I

.2% gap decrease vs national



# Maryland & Price Variation

- Rate setting meant rates varied but not because of market leverage
- 2. Naturally, less variation than elsewhere (good)



Source: MA Health

3. Price variation less relevant under global budgets where focus is aggregate spending



## How do we create a system that supports a healthier population, appropriately rewards high-quality and efficient providers, and also reduces health care spending over time?

- Answer: Everyone in healthcare system should have aligned incentives for these goals.
- Key concepts:
  - Quality vs. outcome
  - Without hospital engagement, little chance of success
  - All-payer aligns incentives



## How do we ensure that different parts of the healthcare system are included?

- Need actionable data for patient care and planning
- Provide opportunities to all for engagement
- Consider integration where possible: ACOs, etc.
- But may not be possible, in which case focus on aligning incentives.
- Even with global budgeting at hospital level in Maryland, planning involves all stakeholders



How can we accomplish a significant change in the health care payment system while supporting opportunities for health care providers to innovate and make decisions that affect their future?

- These two concepts may be linked
- Flexibility is important
- Global budgeting has advantage of being a framework that supports bottom-up implementation
- More thorough vertical integration can also accomplish this goal, but may be more disruptive
- Essential to have vision and then pursue it



## **Conclusions**

- Price variation is an intermediate factor, not an end in itself.
- Reducing price variation in fee-for-service context doesn't necessarily control expenditures or improve outcomes
- Global budgeting and other major payment reforms that incentivize prevention are worth a look.





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#### **Example questions for discussion**

- How do we create a system that supports a healthier population, appropriately rewards high-quality and efficient providers, and also reduces health care spending over time?
- How do we ensure that different parts of the health care system are included (e.g. physicians, specialty providers, and populations beyond those in the small group and/or fully-insured markets)?
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#### **Contact Information**

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