



Working with Regulators: A Focus on CMS An Educational Program of the Cancer Policy Institute at the Cancer Support Community in Partnership with Uniting a Community (UaC): Policy, Advocacy, Education and Action Network

www.CancerSupportCommunity.org

Uniting The Wellness Community and Gilda's Club Worldwide



In Pursuit of Person-centered Cancer Care



Engaging Patients & Families

Shari M. Ling, MD CMS Deputy Chief Medical Officer Center for Clinical Standards and Quality

Cancer Policy Institute at the Cancer Support Community June, 2014

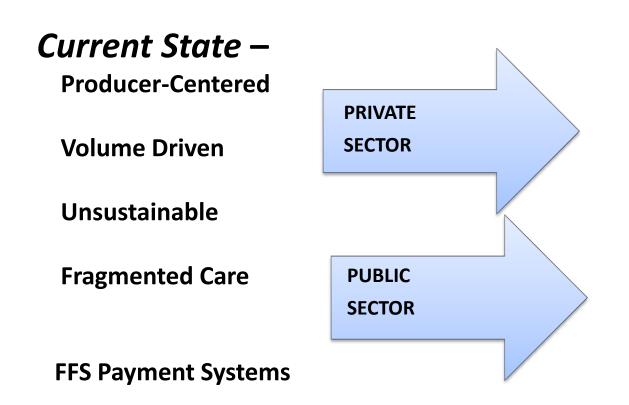
Framing

- Patient-centered measures of cancer care are critical to incentivize improvement in the care for patients with cancer
- Most measures for Oncologists, radiation oncologists and Cancer hospitals have been measures of the technical approaches/processes that should lead to improved outcomes
- CMS would very much welcome input from the Cancer Support Community on the quality issues that most affect patients and caregivers that could inform our measure development efforts
- CMS is also working with external stakeholders, including private payers, to align on the best measures for use across settings. This alignment will reduce reporting burden for clinicians, and will ensure a consistent focus on the quality issues that matter most to patients.

Size and Scope of CMS Responsibilities

- CMS is the largest purchaser of health care in the world.
- Combined, Medicare and Medicaid pay approximately one-third of national health expenditures (approx \$800B)
- CMS programs currently provide health care coverage to roughly 105 million beneficiaries in Medicare, Medicaid and CHIP; or roughly 1 in every 3 Americans.
- The Medicare program alone pays out over \$1.5 billion in benefit payments per day.
- Through various contractors, CMS processes over 1.2 billion fee-forservice claims and answers about 75 million inquiries annually.
- Millions of consumers will receive health care coverage through new health insurance exchanges authorized in the Affordable Care Act.

Delivery system and payment transformation



Future State –

People-Centered

Outcomes Driven

Sustainable

Coordinated Care

New Payment Systems (and many more)

- Value-based purchasing
- ACOs, Shared Savings
- Episode-based payments
- Medical Homes and care mgmt
- Data Transparency

Transformation of Health Care at the Front Line

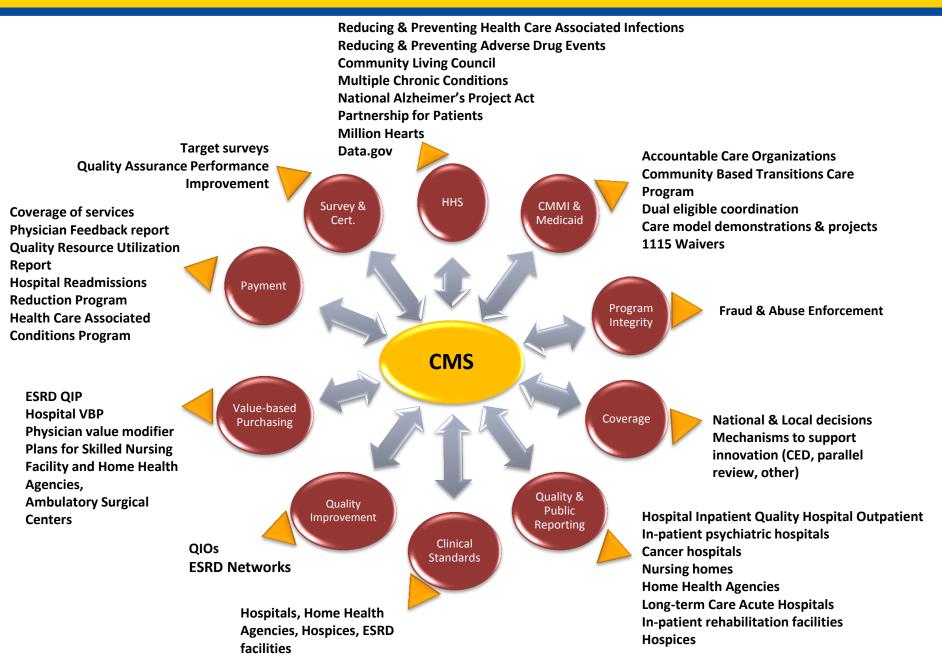
- At least six components
 - Quality measurement
 - Aligned payment incentives
 - Comparative effectiveness and evidence available
 - Health information technology
 - Quality improvement collaboratives and learning networks
 - Training of clinicians and multi-disciplinary teams

Source: P.H. Conway and Clancy C. Transformation of Health Care at the Front Line. JAMA 2009 Feb 18; 301(7): 763-5

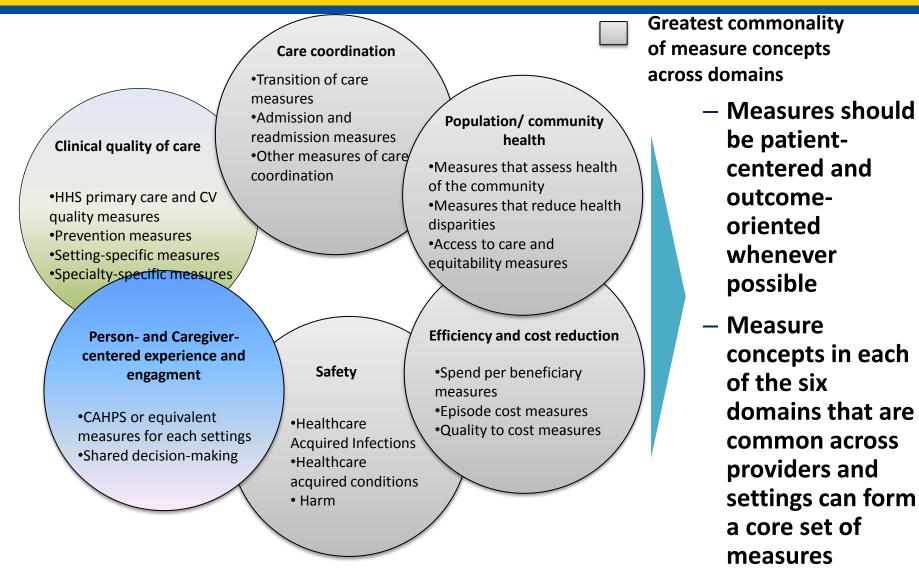
Questions to Run on...

- What are the outcomes that matter?
 For patients, families, providers, systems
- How do we best align around those outcomes?
 - Within and across clinical care settings
 - Across research and health care
- What are the obstacles we need to overcome?

CMS Authorized Programs & Activities



CMS framework for measurement maps to the six national priorities



CMS Quality Programs

Hospital Quality Reporting	Physician Quality Reporting	PAC and Other Setting Quality Reporting	Payment Model Reporting	"Population" Quality Reporting
 Medicare and Medicaid EHR Incentive Program 	 Medicare and Medicaid EHR Incentive Program 	 Inpatient Rehabilitation Facility 	 Medicare Shared Savings Program 	 Medicaid Adult Quality Reporting*
 PPS-Exempt Cancer Hospitals 	• PQRS	 Nursing Home Compare Measures 	 Hospital Value- based Purchasing 	 CHIPRA Quality Reporting*
 Inpatient Psychiatric Facilities 	 eRx quality reporting 	 LTCH Quality Reporting 	 Physician Feedback/Value- based Modifier* 	 Health Insurance Exchange Quality Reporting*
 Inpatient Quality Reporting 		• ESRD QIP		• Medicare Part C*
 Outpatient Quality Reporting 		 Hospice Quality Reporting 		 Medicare Part D*
 Ambulatory Surgical Centers 		 Home Health Quality Reporting 		

* Denotes that the program did not meet the statutory inclusion criteria for pre-rulemaking, but was included to foster alignment of program measures.

PCHQR – Background

PCHQR Statutory Authority and Initial Implementation Date

- Section 3005 of the Patient Protection and Affordable Care Act (ACA)
- Implemented October 1, 2012

• Statutory Authority for Medicare Fee-for-Service Payment

 Section 1886 (d)(1)(B)(v) of the Social Security Act excludes 11 cancer hospitals as designated by Congress from payment under the Inpatient Prospective Payment System (IPPS)

• List of PCHs:

http://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/AcuteInpatientPPS/PPS Exc Cancer Hospasp.html

Existing PCHQR Measures

SCIP (6)

- Surgery Patients who Received Appropriate VTE Prophylaxis within 24 Hrs Prior to Surgery to 24 Hrs After Surgery End Time
- Urinary Catheter Removed on Post-Operative Day 1 or Post-Operative Day 2 with Day of Surgery Being Day Zero
- Prophylactic Antibiotic Received Within 1 Hr Prior to Surgical Incision
- Prophylactic Antibiotic Selection for Surgical Patients
- Prophylactic Antibiotics Discontinued Within 24 Hrs After Surgery End Time
- Surgery Patients on Beta Blocker Therapy Prior to Admission who Received a Beta Blocker During the Perioperative Period

Clinical Process / Oncology Care (5)

- Oncology-Radiation Dose Limits to Normal Tissues
- Oncology: Plan of Care for Pain
- Oncology: Pain Intensity Quantified
- Prostate Cancer-Adjuvant Hormonal
 Therapy for High-Risk Patients
- Prostate Cancer-Avoidance of Overuse Measure-Bone Scan for Staging Low-Risk Patients

Safety and Healthcare Associated Infection – HAI (3)

- NHSN Central Line-Associated Bloodstream Infection (CLABSI) Outcome Measure
- NHSN Catheter-Associated Urinary Tract Infection (CAUTI) Outcome Measure
- Harmonized Procedure Specific Surgical Site Infection (SSI) Outcome Measure

Clinical Process / Cancer-specific Treatments (3)

- Adjuvant Chemotherapy is Considered/Administered Within 4 Months of Diagnosis to Patients Under the Age of 80 with AJCC III (lymph node positive) Colon Cancer
- Combination Chemotherapy is Considered/Administered Within 4 Months of Diagnosis for Women Under 70 with AJCC T1c, or Stage II or III Hormone Receptor Negative Breast Cancer
- Adjuvant Hormonal Therapy

Patient Engagement / Experience of Care (1)

HCAHPS

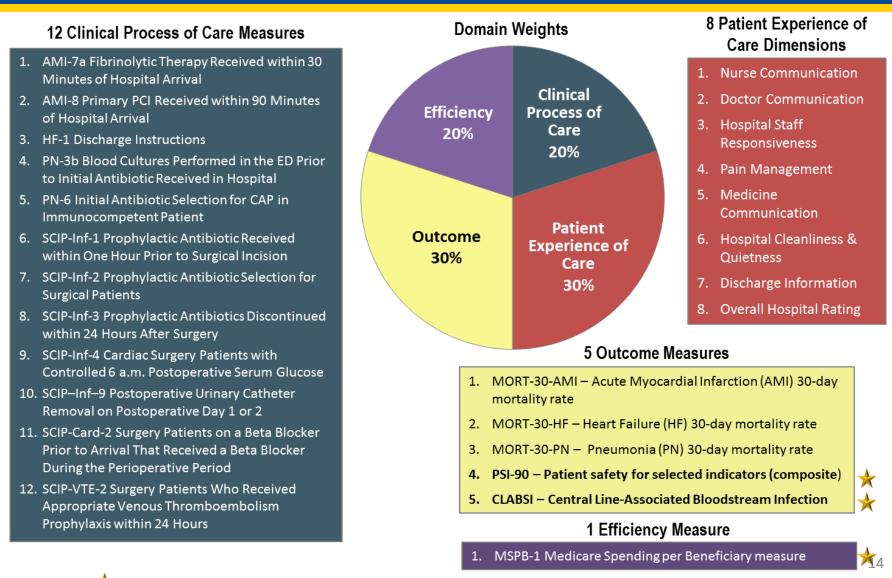
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Value-Based Purchasing

- Goal is to reward providers and health systems that deliver better outcomes in health and health care at lower cost to the beneficiaries and communities they serve.
- Hospital value-based purchasing program shifts approximately \$1 billion based on performance
- Five Principles
 - Define the end goal, not the process for achieving it
 - All providers' incentives must be aligned
 - Right measure must be developed and implemented in rapid cycle
 - CMS must actively support quality improvement
 - Clinical community and patients must be actively engaged

VanLare JM, Conway PH. Value-Based Purchasing – National Programs to Move from Volume to Value. NEJM July 26, 2012

FY 2015 Finalized Domains and Measures/Dimensions



🍸 Represents a new measure for the FY 2015 program that was not in the FY 2014 program.

Patient Experience of Care Measures

- HCAHPs used for Hospital VBP weighted at 30% of total score starting in FY 2015
- CG-CAHPS used in the PQRS, ACO and Physician VM programs for groups of 25 or more
 - CMS is exploring expansion of this measure for all clinicians
- CAHPS measures are in use or in development for every setting of care
 - Post Acute Care (LTCH, IRF, Home Health)
 - In-Center Dialysis
- First <u>caregiver</u> experience measure implemented in the Hospice quality reporting program

Value-Based Purchasing Program Objectives over Time Towards Attainment of the Three-part Aim

Near-term programs FY2014-2016

Initial programs FY2012-2013

- •Limited to hospitals (HVBP) and dialysis facilities (QIP)
- •Existing measures providers recognize and understand
- •Focus on provider awareness, participation, and engagement
- •SNF and HH VBP Plans

Expand to include physicians New measures to address HHS priorities

- Increasing emphasis on patient experience, cost, and clinical outcomes
- Increasing provider engagement to drive quality improvements,
 e.g., learning and action networks

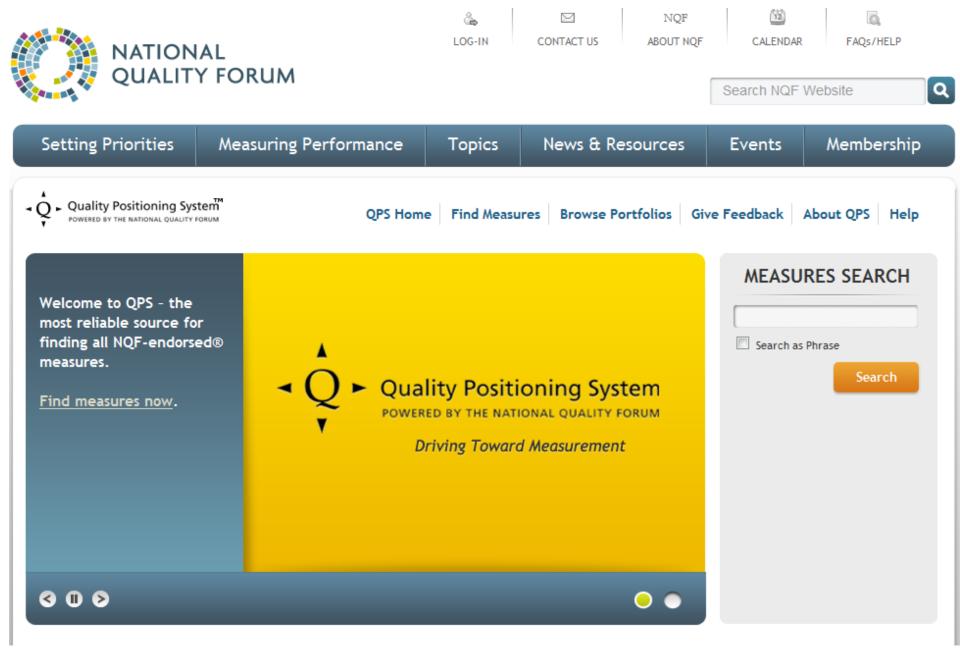
Longer-term FY2017+

•VBP measures and incentives aligned across multiple settings of care and at various levels of aggregation (individual physician, facility, health system)

•Measures are patient-centered and outcome oriented

- •Measure set addresses all 6 national priorities well
- •Rapid cycle measure development and implementation
- •Continued support of QI and engagement of clinical community and patients
- •Greater share of payment linked to quality

Vision for VBP



+ http://www.qualityforu	m.org/QPS/QPST	ool.aspx#qpsPageState=%7B%22TabType%22%3A1,%22TabContentType%22%3A1,%22SearchCriteriaFor: 🔎 👻 🗟 🖒 🗙 🛛 🏭 NQF: Quality Positioning Sy 🗙 👘		@☆					
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All Your search term matches a Clinical Condition/ Topic Area.	0220	20 Adjuvant hormonal therapy Commission on Cancer, American College of Surgeons Oct 22, 2012 ENDOR							
Measure Steward	2020	Adult Current Smoking Prevalence Centers for Disease Control and Prevention, National Center for Oct 19, 2012 Chronic Disease Prevention and Health Promotion							
 National Quality Strategy Priorities 	0566	Age-Related Macular Degeneration (AMD): Counseling on Antioxidant Supplement American Medical Association - Physician Consortium for Oct 30, 2009 END Performance Improvement (AMA-PCPI) Oct 30, 2009 END							
Use in Federal Program	0464	4 Anesthesiology and Critical Care: Prevention of Catheter-Related Bloodstream Infections (CRBSI) – Central Venous Catheter (CVC) Insertion Protocol American Medical Association - Physician Consortium for Jul 31, 2008 ENDORSED Performance Improvement (AMA-PCPI)							
Actual/Planned Use	0579	0579 Annual cervical cancer screening or follow-up in high-risk women May 02, 2012 ENDOR							
Care Setting	- 0005								
 Clinical Condition/ Topic Area 	0225	O225 At least 12 regional lymph nodes are removed and pathologically examined for resected colon cancer. Commission on Cancer, American College of Surgeons Oct 22, 2012 ENDORSEC							
Cross-Cutting Area	1854 Barrett's Esophagus College of American Pathologists Feb 25, 2014 ENDORS								
Data Source	Breast Cancer Resection Pathology Reporting- pT category (primary tumor) and pN category (regional lymph nodes) with histologic grade American Medical Association - Physician Consortium for May 06, 2014								
Level of Analysis	Performance Improvement (AMA-PCPI)								
Measure Status	0559	Co559: Combination chemotherapy is considered or administered within 4 months (120 days) of diagnosis for women under 70 with AJCC T1c, or Stage II American College of Surgeons Oct 22, 2012 ENDOR or III hormone receptor negative breast cancer.							
Measure Type	OU32 Cervical Cancer Screening (CCS) National Committee for Quality Assurance Jan 06, 2014 ENDERS								
Target Population									
eMeasure Available	CREcare Jul 31, 2008 ENDORSED								
^	0379 Chronic Lymphocytic Leukemia (CLL): Baseline Flow Cytometry American Medical Association - Physician Consortium for Oct 30, 2013 ENDORSED Performance Improvement (AMA-PCPI)								

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NQF-Endorsed	NQF#	Title							▲ Steward				Updated	Status
	0032	Cervical Cancer Screening	g (CCS)						National Committee	or Quality A	ssurand	ce	Jan 06, 2014	ENDORSED
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Your search term matches a Clinical Condition/ Topic Area.	0034	34 Colorectal Cancer Screening (COL) National Committee for Quality Assurance							Jan 00, 2014	ENDORGED				
Measure Steward	0385	Oncology: Chemotherapy for AJCC Stage III Colon Cancer Patients American Medical Association - Physician Consortium for Performance Improvement (AMA-PCPI)						Oct 30, 2013	ENDORSED					
 National Quality Strategy Priorities 	0387	Oncology: Hormonal therapy for stage IC through IIIC, ER/PR positive breast cancer American Medical Association - Physician Consortium for Performance Improvement (AMA-PCPI)						Oct 30, 2013	ENDORSED					
● Use in Federal Program	0384	Oncology: Pain Intensity Quantified – Medical Oncology and Radiation Oncology (paired with 0383) Performance Improvement (AMA-PCPI)						Oct 30, 2013	ENDORSED					
Actual/Planned Use	0389	Prostate Cancer: Avoidan	ce of Overuse of Bone Sc	an for Staging Low	Risk Prostate Cancer F	atients			American Medical A				Feb 25, 2014	ENDORSED
Care Setting									Performance Improv	ement (AMA	-PCPI)			
 Clinical Condition/ Topic Area 														
Cross-Cutting Area														
Data Source														
Level of Analysis														
Measure Status														
Measure Type														
 Target Population 														
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NQF: Multiple Chronic Conditions (MCC) Measurement Framework

High-Leverage MCC Measure Concepts	National Quality Strategy Priorities	Corresponding High Priority Illustrative Measures
Optimizing function, maintaining function, or preventing further decline in function	Enable healthy living; optimize function	 Long-stay nursing home residents with moderate-severe pain Long-stay nursing home residents with depressive symptoms Change in basic mobility or function for post-acute care
Seamless transitions between multiple providers and sites of care	Effective communication and coordination of care	 Care Transition Measure—CTM-3 Transition record with specified elements received by discharged patients
Patient important outcomes (includes patient-reported outcomes and relevant disease-specific outcomes)	Prevention and treatment of leading causes of mortality	Health outcomes—mortality and morbidity
Avoiding inappropriate, non-beneficial care, including at the end of life	Make care safer	 Hospice patients who didn't receive care consistent with end-of-life wishes CARE mortality follow back survey of bereaved family members Inappropriate non-palliative services at end of life
Access to a usual source of care	Effective communication and coordination of care	 People unable to get or delayed getting needed medical care, dental care or prescription medications Access problems due to cost
Transparency of cost (total cost)	Making quality care more affordable	 Average annual expenditures per consumer unit for healthcare Consumer price indexes of medical care prices Personal health care expenditures, by source of funds
Shared accountability across patients, families, and providers	Effective communication and coordination of care	Children with effective care coordination and with a medical home
Shared decision-making	Person- and family-centered care	 Persons whose healthcare providers always involve them in decisions about their healthcare as much as they wanted

CMS Activities on Patient Reported Outcome Measures

- In 2012, CMS funded the NQF to develop guidance on development of PROMs
- CMS currently uses a number of PROMs in our clinician reporting programs (e.g. depression, functional status)
- CMS and HHS working to identify existing PROMs that can be rapidly incorporated into our quality reporting programs, including the ACO program and CMMI models.
- CMS and ONC are currently developing PROMs for the hospital and outpatient setting
 - Disease-specific functional status
 - General functional status
- CMS now includes patients in all measure development work, in order to understand the outcomes that are most important to patients and families

The Future of Quality Measurement for Improvement and Accountability

- Meaningful quality measures increasingly need to transition away from setting-specific, narrow snapshots
- Reorient and align measures around patient-centered outcomes that span across settings
- Measures based on patient-centered episodes of care
- Capture measurement at 3 main levels (i.e., individual clinician, group/facility, population/community)
- Why do we measure?

– Improvement

Source: Conway PH, Mostashari F, Clancy C. The Future of Quality Measurement for Improvement and Accountability. JAMA 2013 June 5; Vol 309, No. 21 2215 - 2216



NATIONAL QUALITY FORUM

• Becoming a Member: Interested orgs can apply for membership- directed to healthcare stakeholders, consumer orgs, public and private purchasers, doctors, etc. NQF members can participate on committees and panels.

http://www.qualityforum.org/Membership/Join_NQF.aspx

 Providing Feedback on NQF Measures: NQF has a tool, the Quality Position System (QPS), that allows feedback on NQF-endorse measures by measure implementers and users. Users can request an ad-hoc review, submit measure use info, and general feedback.

http://www.qualityforum.org/Field_Guide/Feedback.aspx



NATIONAL QUALITY FORUM

• **Public and Member Comments on Draft Reports:** Both NQF members and the general public can review and comment on a steering committee's draft report. This is process is only open for 30 days.

http://www.qualityforum.org/Measuring Performance/Consensus Develop ment Process%e2%80%99s Principle/Public and Member Comment.aspx

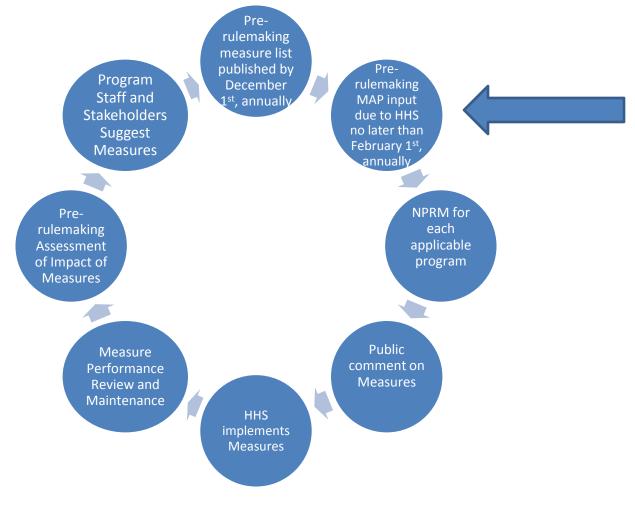
 Submitting Candidate Standards for Consideration: Interested stewards and/or developers of performance may submit standards for consideration by the NQF. Again, this process is not directed towards patients or their families. <u>http://www.qualityforum.org/Measuring_Performance/Submitting_Standards.aspx</u>

Affordable Care Act Statutory Requirements

Making publicly available by December 1st annually a list of measures under consideration by HHS for qualifying programs;

- Convening multi-stakeholder groups to provide input on the selection of quality and efficiency measures under consideration by HHS;
- Transmission of that input to HHS no later than February 1st of each year;
- Consideration of that input by HHS;
- Publishing rationale for the selection of any quality and efficiency measures not endorsed by the National Quality Forum (NQF); and
- Assessing the impact of the use of endorsed quality and efficiency measures at least every three years (The first report was released to the public in March of 2012. The next impact assessment report is scheduled for release in March of 2015.).

Measure Selection Process Measure Implementation Cycle



MAP Strategic Plan:2012-2015 Report

Our Goals for this Process

- To obtain expert multi-stakeholder input on quality and efficiency measures considered for implementation in programs by the Secretary for the 2014 Federal rulemaking process
 - Which measures should we propose in programs?
 - What are the high priority measures?
 - What are the gaps and how will we fill those gaps in the future?

Balancing Measurement Goals

Achieve high participation rates by providers	 Enable improvement and assess the performance of all providers and to empower patients with this information.
Align reporting requirements with National Quality Strategy priorities	 Address and measure high priority conditions and domains in order to provide a comprehensive assessment of the quality of health care delivered.
Increase the reporting of quality data by providers and more rapid feedback loops	 Drive quality improvement of the healthcare delivery system
Increase EHR and registry reporting for quality reporting programs	 Improve quality of care through the meaningful use of EHRs and use of registry- based measures.
Increase patient-centered outcome measures, including patient reported measures	• Ensure measurement focus is on patients , includes information derived from patients, and is useful to patients
Increase the transparency, availability, and usefulness of quality data	• Empower providers and the public with information to make informed decisions and drive quality improvement (e.g., Compare sites)

Cancer Hospital Quality Reporting

- Late April proposed rule publication of CMS's policy on cancer services and treatment
- Public comment and feedback 60 days after NPRM published
 - Submitted to <u>http://www.regulations.gov/#!home</u>. Public has 60 days to provide their feedback and comments.
- CMS will answer the public comments in the final ruleusually sometime in early August.
- Additional resources: <u>http://www.reginfo.gov/public/jsp/Utilities/faq.jsp;</u> <u>http://www.archives.gov/federal-</u> <u>register/tutorial/online-html.html</u>



• **General Outreach & Education:** CMS has a list of their outreach and training programs. Most are directed towards stakeholders who work with CMS.

http://cms.hhs.gov/Outreach-and-Education/Outreach-and-Education.html

• Sharing an Idea with CMMI: On CMMI's site, anyone is able to share an idea that would provide better care, lower costs, improve the system, etc.

http://innovation.cms.gov/Share-Your-Ideas/index.html

Opportunities and Challenges of a Lifelong Health System

- Goal of system to optimize health outcomes and lower costs over much longer time horizons
- Payers, including Medicare and Medicaid, increasingly responsible for care for longer periods of time
- Health trajectories modifiable and compounded over time
- Importance of early years of life Source: Halfon N, Conway PH. The Opportunities and Challenges of a Lifelong Health System. NEJM 2013 Apr 25; 368, 17: 1569-1571

Discussion

- What are the outcomes that matter?
 For patients, families, providers, systems
- How do we best align around those outcomes?
 - Within and across clinical care settings
 - Across research and health care
- What are the obstacles we need to overcome?



Contact Information

Shari M. Ling, MD CMS Deputy Medical Officer 410-786-6841 shari.ling@cms.hhs.gov





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