



July 17, 2017

Dear Rhode Island Primary Care Practice:

As health care in Rhode Island and nationally moves away from traditional fee-for-service payment models toward methods that reward quality and cost efficiency, it is essential that these new payment methods are supported by a high quality primary care infrastructure. The Patient Centered Medical Home (PCMH) model of primary care is meant to transform care in a way that is patient-centered, comprehensive, team-based, coordinated, accessible, and focused on quality. It is a model for achieving primary care excellence, where patients are treated with respect, dignity and compassion, and where strong and trusting relationships with providers and staff are enabled.¹

Over the past few years, the Rhode Island Office of the Health Insurance Commissioner (OHIC) has implemented policies and initiatives that promote primary care through the PCMH model. Health plans are required to contract with an increasing number of PCMHs each year, and to sustain practice transformation, health plans must support PCMHs financially through "Sustainability Payments." OHIC only requires health plans to make these payments to practices that meet OHIC's three-part definition of PCMH.

Providers who wish to be recognized by OHIC as a PCMH and qualify for Sustainability Payments in 2018 must complete and submit the Cost Management Strategies Survey and Performance Improvement Survey by Monday October 16, 2017.

The enclosed FAQ document provides links to these surveys as well as more details about OHIC's care transformation initiatives and what it might mean for your practice.

If you have any questions or concerns, please contact Libby Bunzli at 401-462-2144 or libby.bunzli@ohic.ri.gov

Sincerely,

A handwritten signature in cursive script that reads "Marie Ganim".

Marie Ganim, PhD
Health Insurance Commissioner

¹ Patient-Centered Primary Care Collaborative. "Defining the Medical Home: A patient-centered philosophy that drives primary care excellence." www.pcpcc.org/about/medical-home

Frequently Asked Questions

1. Why is the Health Insurance Commissioner promoting primary care Patient-Centered Medical Homes (PCMHs)?

- a. The Health Insurance Commissioner is charged by the legislature to address the affordability of health care in Rhode Island and OHIC's initiatives have emphasized the need for a strong primary care infrastructure. Since 2010, OHIC directed health plans to increase and then sustain the proportion of total medical spending dedicated to primary care, without adding to the overall cost of health insurance premiums. Since 2011, OHIC has been promoting PCMH transformation through the multi-payer supported Care Transformation Collaborative-RI (CTC-RI) initiative.¹
- b. There is substantial evidence that primary care practices that function as PCMHs reduce total health care costs by improving the quality of care provided and by better coordinating and managing care.²
- c. To expand the PCMH transformation process in the state, OHIC is now requiring commercial health plans to contract with more PCMHs each year.

2. What are the commercial health plans' targets for PCMH expansion?

- a. Health plans subject to the Office's Affordability Standards are required to have 80% of their contracted clinicians operating in a PCMH by the end of 2019.

3. What is the OHIC definition of a PCMH?

- a. OHIC, with physician and insurer guidance, has developed a three-part definition of PCMH that requires demonstration of practice transformation, cost management initiatives and clinical improvement.
- b. For recognition in 2018, to be considered a PCMH, a practice must:
 - i. Achieve NCQA PCMH recognition³ (2017, or Level 3 in 2011 or 2014), or be participating in CTC-RI or in any payer-sponsored PCMH transformation program;

¹ See: www.ctc-ri.org/

² See: www.pcpcc.org/resource/patient-centered-medical-homes-impact-cost-and-quality-2014-2015

³ As NCQA revised its standards in early 2017, OHIC's Care Transformation Advisory Committee will evaluate these changes and solicit stakeholder input on any necessary amendments to the OHIC definition of a PCMH during its fall convening.

1. A practice **does not** need to verify and submit NCQA PCMH status because OHIC is getting all information it needs from NCQA, CTC-RI, and from the health plans.
- ii. Complete the Cost Management Strategies Self-Assessment by **October 16, 2017** and demonstrate that at least 80% of requirements have been met. The requirements vary based on the experience of the practice;
- iii. Submit quality performance measures data for all OHIC PCMH measures by **October 16, 2017** and demonstrate the required level of improvement or performance achievement.
 1. Report period will cover 10/1/2016 – 10/1/2017.

Summary of 2018 Reporting Requirements by Year of Transformation Experience

Transformation Experience	Cost Management Strategies	Quality Performance
Practice joined CTC/PCMH-Kids/TCPI on or after 1/1/17 or is not participating in any formal transformation initiative	Must report only	Must report baseline data
Practice joined CTC/PCMH-Kids/TCPI during 2015 or 2016, or independently achieved NCQA Level 3 during 2015 or 2016	Must meet Year 1 requirements	Must meet performance improvement requirements
Practice joined CTC prior to 1/1/15 or independently achieved NCQA PCMH Level 3 recognition prior to 1/1/15	Must meet Year 2 requirements	Must meet performance improvement requirements

4. What are the Cost Management Strategies?

- a. OHIC collected feedback from its stakeholders to develop a set of cost management strategies as part of the OHIC PCMH definition. These strategies include:
 - i. Practice develops and maintains a high-risk patient registry that tracks patients identified as being at risk of avoidable intensive service use in the near future;
 - ii. Practice uses data to implement care management (care coordination for children), focusing on high-risk patients and interventions that will impact ED and inpatient utilization;
 - iii. Practice implements strategies to improve access to and coordination with behavioral health services;

- iv. Practice expands access to services both during and after office hours;
 - v. Practice develops service referral protocols informed by cost and quality data provided by payers; and
 - vi. Practice develops/maintains an avoidable ED use reduction strategy.
- b. Requirements vary based on the practice's level of transformation experience:
- i. Practices that joined CTC (including PCMH Kids) or TCPI on or after January 1, 2017, or practices that are not participating in any formal transformation initiative must *report on* Year 1 requirements, but are not required to meet 80%.
 - ii. Practices that joined CTC (including PCMH Kids) or TCPI during 2015 or 2016, or independently⁴ achieved NCQA PCMH Level 3 recognition during 2015 or 2016 must meet 80% of the Year 1 requirements.
 - iii. Practices that joined CTC prior to January 1, 2015 or independently achieved NCQA PCMH Level 3 recognition prior to January 1, 2015 must meet 80% of the Year 2 requirements.

5. What are the performance improvement measures?

- a. The performance improvement measures all come from the SIM aligned measure set that commercial insurers will be utilizing for contracting.
- b. The measures for internal medicine and family practices are:
 - i. Comprehensive Diabetes Care: Hemoglobin A1c (HbA1c) Control (<8.0%)
 - ii. Controlling High Blood Pressure
 - iii. Tobacco Use: Screening and Cessation Intervention
 - iv. Adult Body Mass Index Assessment
 - v. Screening for Clinical Depression and Follow-Up Plan
- c. The measures for pediatric practices are:
 - i. Weight Assessment and Counseling for Nutrition and Physical Activity (including 3 sub-measures)
 - ii. Developmental Screening
- d. Quality measurement specifications can be found at OHIC's website. Each year there will be a process to review the quality measures for continued alignment with other relevant programs, practice experience, set the Rhode Island benchmark if a national benchmark is not available, and make adjustments as needed.

⁴ Refers to practices that did not complete a formal transformation initiative like CTC, but achieved NCQA recognition on their own.

6. What are the performance improvement requirements?

- a. For 2018 recognition, meaningful performance improvement is defined as:
 - i. 3 percentage point improvement over one or two years or performance at or above the national 66th percentile (average of Medicaid and commercial NCQA HEDIS values), or performance at or above the state median in absence of an NCQA HEDIS rate, or
 - ii. Performance at or above the national 66th percentile (average of Medicaid and commercial values) alone if the practice does not report a prior year rate in addition to the performance measurement period rate.
 - iii. First time reporting practices: For practices submitting data for the first time, data will be recorded as baseline. Performance improvement in future years will be assessed against these year 1 baselines.

7. How do practices submit the required information?

- a. Each year, OHIC will create a web-based process on its website for practices to submit the required information ([Cost Management Strategies Survey](#) and [Performance Improvement Survey](#)). Surveys are distributed and posted on the OHIC website in July, and must be completed by October 15th (or the closest business day) of each year.

8. How will practices know if they have met the requirements?

- a. OHIC will post on its website a list of practices and which elements of the PCMH definition they have met.
- b. Information will be available the first week in November of each year.
- c. Insurers may elect to audit practice submissions.

9. What help is available to practices to become PCMHs?

- a. There are currently two state-wide programs available. One is the Care Transformation Collaborative (CTC-RI) which includes adult practices and pediatric practices through a PMCH-Kids contract, which is supported by all major RI health plans. CTC-RI has been operating since 2008 and currently supports 69 active sites and 42 alumni practices that have graduated from the program. These figures represent 525 primary care providers that serve approximately 340,000 Rhode Islanders. For more information contact: CTCRI@umassmed.edu.
- b. The Rhode Island Quality Institute (RIQI) received a multi-million dollar federal grant to help practices (both primary care and specialty) learn to implement

quality improvement initiatives, which is foundational to being a PCMH. For more information contact: info@riqi.org.

- c. Some health plans and ACOs also provide care transformation support.

10. If a practice meets the definition of PCMH, when will it get Support Payments?

- a. Commercial health plans are obligated to pay practices Support Payments when the health plan includes the practice in its OHIC PCMH target count. Plans may make the payments directly to the practice or to the contracting entity with which the practice is affiliated. Plans are not obligated to pay Support Payments to practices that meet the OHIC PCMH definition, but are not included in the health plan's PCMH target count.
- b. The health plan must make payments every year that the practice is included in the PCMH target count. OHIC will be assessing practice achievement in October of each year. A practice that newly meets the definition can expect to receive payment during the next calendar year following OHIC PCMH recognition, if the practice is to be included in the health plan's PCMH target count for OHIC.

11. How much will the Support Payment be to practices?

- a. The level of Support Payments will be negotiated between the practice and the health plans. OHIC is not setting a payment level, but has told health plans that the levels must be meaningful to the practices.

12. Do the payments apply to all of my patients, or only certain ones?

- a. OHIC has regulatory authority only over fully insured commercial health plans. Therefore, payments must apply to your patients who are covered by fully insured benefits. The OHIC regulations also require that fully insured accounts not shoulder more than their fair share of the costs of the PCMH recognition program.
- b. Historically, the health plans have also made payments for patients covered by self-insured accounts for practices participating in CTC-RI. OHIC anticipates, but cannot require, that they will continue to do so.

13. What happens if the practice does not meet the definition of PCMH?

- a. If the practice does not meet the PCMH definition, the health plans will not be able to include them in their PCMH target count.
- b. While under OHIC regulations the health plan will no longer be obligated to make Support Payments if the practice does not meet the PCMH definition, the health plan will not be precluded from doing so. Final decisions on whether a practice

that doesn't meet the definition shall receive support payments is the responsibility of the payer. Payers reserve the right to do review the accuracy of practice self-attestation for the purposes of determining payments.

14. Can practices resubmit data to meet the PCMH definition?

- a. Practices may submit data annually to OHIC, as described in the response to question 3, above.

15. Once a practice is recognized as a PCMH, will it always be recognized as a PCMH by OHIC?

- a. No. A practice must meet each element of the definition of PCMH each year.

16. Will OHIC be evaluating whether this PCMH initiative reduces health care costs and is beneficial to practices, health plans and residents of Rhode Island?

- a. Yes, OHIC, along with other stakeholders, will be conducting an ongoing evaluation of this PCMH initiative. The standards and definition of a PCMH will be examined and revisited each year in a committee process.

17. Why should practices try to meet the OHIC definition of PCMH?

- a. Commercial insurers, Medicaid, and Medicare are all moving away from fee-for-service payments to more value-based payments that reward improved quality and reduced costs.
- b. Primary care practices continue to serve a vital function in Rhode Island. These new payment models aim to help and support providers in delivering more coordinated care to their patients, while rewarding quality of care and efficiency.
- c. The support programs currently available to practices – CTC-RI and RIQI – offer practices an opportunity to get expert assistance to learn how to transform. The Support Payment rewards practices for their efforts.